



## CHAPTER 4: ELIGIBILITY AND CERTIFICATION

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### **POLICY**

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The Idaho WIC Program operates according to WIC program specific federal regulations including eligibility determination and certification procedures to provide program benefits.

### **PURPOSE**

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The sections in this chapter describe WIC program staff responsibilities to determine eligibility, complete the certification process, and properly notify individuals of ineligibility.

### **SCOPE**

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The policy applies to all State and local agency staff operating within the Idaho WIC Program.

### **DEFINITIONS**

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#### **Application**

The form used to record the applicant's name, address and the date. May also include additional information necessary to determine eligibility.

#### **Application Date**

The application date is the date the application is completed.

#### **Appointment Date**

Date the participant completes and/or is scheduled to come in for an appointment such as certification, nutrition education contact or health screening. If a participant reschedules an appointment, the new date should be reflected as the appointment date with the prior date documented.

#### **Certification**

This means the implementation of criteria and procedures to assess and document each applicant's eligibility for the Program.

#### **Initial contact**

This date is when the individual calls or visits the local agency during clinic office hours to make an oral or written request for Program benefits. The initial contact date is when processing timeframes shall begin.

#### **In-State Transfer**

A participant transferring from one local agency to another local agency within the state of Idaho.

#### **Out-Of-State Transfer**

A participant transferring into Idaho from another state or a participant transferring out of Idaho to another state.

#### **Participant**

The participant, parent, Responsible Adult (e.g., guardian, caretaker,) proxy, Authorized Signer, infant, child, pregnant woman, postpartum woman, and/or breastfeeding woman who receive supplemental foods from the WIC program.

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- Section D Health Screen
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# SECTION A: ELIGIBILITY

## OVERVIEW

### IN THIS SECTION

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Persons Living in an Institution  
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    Waiting Lists  
    Procedure – Verification of Certification  
Issuing a Verification of Certification Document (VOC)

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## ELIGIBILITY CRITERIA

### POLICY

To be certified as eligible to receive WIC program benefits in Idaho, an applicant must be categorically eligible, live within the health service area, meet income guidelines, and have a nutritional need.

### CATEGORICALLY ELIGIBLE

Applicants must be in one of five categories:

- Pregnant woman (P)
- Breastfeeding woman up to one year postpartum (B)
- Postpartum woman not breastfeeding less than six months postpartum (N)
- Infant up to 1 year of age (I)
- Child 1 to 5 years of age (C)

### RESPONSIBLE ADULT

The Responsible Adult is usually the parent (or caretaker) who makes the initial contact to apply for WIC services and attends the certification appointment to apply for WIC for self or for children. It is acceptable for either parent to be the Responsible Adult for infant and child participants.

Generally, the Responsible Adult should be the parent or caretaker who will most often attend appointments on behalf of the infant or child participant. The Responsible Adult should not change mid-certification unless there are extenuating circumstances. Therefore, use of an Authorized Signer or Proxy is encouraged when applicable.

An Authorized Signer may be designated at the request of the Responsible Adult to lessen participation barriers (e.g., work schedules, sickness, or ease of shopping).

It is permissible to designate a proxy to attend appointments for the Responsible Adult and/or Authorized Signer during the certification period if circumstances indicate doing so will lessen participation barriers (e.g., a change in work schedule).

## **RESIDENCY**

All participants must reside within the state where they receive WIC benefits.

Applicants must live within the boundaries of the public health district or tribal services to receive benefits from that program.

Agreements between state agencies may be established for those participants living outside the boundaries of Idaho who use Idaho health care because of long distances to their own state health care services. Contact the State agency.

## **INCOME ELIGIBLE**

An applicant's income must be verified to be within the limits of total gross household income level/ household size as defined in the Income Eligibility Guidelines, or adjunctively income eligible based on eligibility for Medicaid, TANF, SNAP or CHIP.

## **NUTRITIONAL RISK**

Nutrition Risk Criteria are specifically defined per category, and are assessed by a medical assessment (height, weight, hemoglobin or hematocrit, and pertinent medical information) and a nutrition assessment.

## **ANTHROPOMETRIC SCREENING**

Requirements

Measurement of weight and height (or length) is required at certification for assessing nutritional risk.

Measurements from another source (e.g., physician's office) may be used if the measurement was taken within 60 days of the certification and is reflective of the current category.

Exceptions (document in participant file):

- An applicant who has a medical condition or disability which makes obtaining the measurement at certification impossible
- An applicant who has a disability that prevents his/her presence at certification
- Difficult child struggling with certifier during procedure

Measuring Weight

- Staff are to perform weight measurements according to the techniques described in the Paraprofessional Training Manual.

Measuring Height

- Staff are to perform height measurements according to the techniques described in the Paraprofessional Training Manual.

## INFANTS

- Infants are weighed without clothing and diaper. Infants are weighed using an infant scale.
- Infants are measured using a recumbent length board.
- Premature infants less than 40 weeks adjusted age will be assessed by an RD for rate of weight and height gain (chart may be routed if an RD is not available during certification appointment) and won't be plotted on a premature or regular infant grid. Estimated "in utero" rates of growth are weight gain of 15 g/kg/day and length gain of .05-1.0 cm/week. The RD may document the assessment in the Participant Care Plan or RD Referral follow-up notes.
- Infants at or beyond 40 weeks adjusted age will be plotted on the regular growth chart.

## CHILDREN

- Children are measured in minimal indoor clothing (without coat/hats/boots, in light shirt/pants without shoes).
- Child weight is measured using either an infant scale or an adult scale. Which scale to use is determined by the size of the child and up to the discretion of the Competent Professional Authority (CPA) and Responsible Adult.
- Child length is measured using a recumbent length board if the child is less than 24 months of age.
- Child height is measured using a wall stature board if the child is more than 24 months of age, unless the child is too small to use a stature board. If recumbent length is measured, the length must be plotted on the correct growth chart.

## WOMEN

- Women are measured in minimal indoor clothing (without coat/hats/boots, in light shirt/pants without shoes).
- Women are weighed using an adult scale (floor model).
- Women are measured using a wall mounted stature board.

## CALIBRATION OF EQUIPMENT

Calibration means to standardize a measuring instrument by determining its deviation from a known standard. Each piece of anthropometric equipment should be evaluated at least quarterly to make sure it is calibrated and in working order.

The WIC Coordinator must maintain a written record of equipment calibration and staff training for use of equipment. The Idaho WIC Paraprofessional Training Manual should be used to train staff. Some equipment is self-calibrating.

## HEMATOLOGICAL SCREENING

A hemoglobin or hematocrit test is required at certification for assessing nutritional risk.

Test results from another source (e.g., physician's office) may be used if the measurement was taken within 60 days of the certification and is reflective of the current category.

Exceptions:

- Infants less than 9 months of age
- Children 2 years and older only need one test per year if the test was within normal limits at the previous certification
- Breastfeeding women only require one postpartum test

Exceptions (document in participant file):

- An applicant who has a medical condition or disability which makes obtaining the test measurement at certification impossible
- An applicant who has a disability that prevents his/her presence at certification
- An applicant who has cultural, personal, or religious beliefs that conflict with drawing blood
- Difficult child struggling with certifier during procedure

Staff are to perform the hemoglobin/hematocrit test according to the manufacturer's specifications for the machine used and in accordance with CLIA and OSHA recommendations.

## REFERENCE

7 CFR 246.7(e)(1) Determination of Nutritional Risk

WRO Policy Memorandum 803-AP, Nutrition Risk Criteria (March 30, 2001)

WRO Policy Memorandum 803-Z, Bloodwork Requirements for Children and the Allowability of Additional Blood Tests During Certification Periods (August 1994)

WRO Policy Memorandum 803-AO, Policy Memos Related to Bloodwork Requirements (January 2001)

Nutritional Screening of Children: A Manual for Screening and Follow-up, US Department Health and Human Services Administration, Bureau of Community Health Services, Publication No. HAS 81-5114, 1981

Lohman, TG et al, editors. Anthropometric Standardization Reference Manual. Human Kinetics Books, 1988, pp.4-8.

Simko MD et al. Nutrition Assessment: A Comprehensive Guide for Planning Intervention. Aspen Publications, 1984, pp. 72-80.

All States Memorandum, 803-M, *Bloodwork Protocols*, July 27, 1992.

## PRIORITY LEVELS

### CLARIFICATION

According to the category and nutritional risk criteria identified by a CPA, a priority level is assigned to each participant. The priority level establishes the need for WIC services and prioritizes the applicants for WIC services.

- A breastfeeding mother and her breastfed infant must be placed in the same priority level and should be the highest for which either qualifies.

### PRIORITY I

- Pregnant women (P), breastfeeding women (B), or infants (I) who are at risk based on medical assessment

### PRIORITY II

1. Infants up to 6 months of age born to a WIC mother, or born to a mother who was at nutritional risk during her pregnancy, but was not enrolled in WIC during the pregnancy.

- A breastfeeding (B) mother of a fully breastfed Priority II infant will also be assigned Priority II.

### **PRIORITY III**

- Children (ages 1 to 5) who are at risk based on medical assessment
- Postpartum women (N) who were less than 16 years old at conception

### **PRIORITY IV**

- Pregnant women (P), breastfeeding women (B), or infants (I) who are at risk based on nutritional risks only
- Postpartum, non-breastfeeding women (N) who have two or more nutritional risks based on medical risk only, excluding nutritional risks

### **PRIORITY V**

- Children (ages 1 to 5) with nutritional risk only

### **PRIORITY VI**

- Postpartum women (N) who have one identified risk; may include nutritional-related risk criteria or transfer criteria code (79)

## **ADOPTION AND WET NURSES**

### **POLICY**

A breastfeeding woman does not have to be the birth mother of the infant to be certified as a breastfeeding woman. Wet nurses and nursing adoptive mothers are eligible if they meet eligibility criteria. However, both the birth mother and adoptive mother of the same infant cannot be certified as breastfeeding women. The birth mother would only qualify as a postpartum woman. This applies if the relationship is known to exist.

### **ADOPTED CHILD**

When a family adopts a child, the household size and income of the entire household is used to determine income eligibility. Typically, the adopted child will have been a foster child in the home for some time prior to adoption.

When a child is adopted, it may be necessary to sever all ties with the previous identity, including issuing a new WIC participant ID and Social Security number. Contact the WIC Help Desk for guidance. The appropriate procedure is determined on a case-by-case basis.

### **REFERENCE**

FNS Instruction 803-R WIC Eligibility of Wet Nurses (6-25-93)

FNS Instruction 803-AC Non-Birth Mothers Certified as Breastfeeding Women (10-16-95)

## **FOSTER CHILDREN**

### **POLICY**

An infant or child in foster care is certified according to standard procedures. A foster child living with a foster family, but remaining the legal responsibility of the Department of Health and Welfare (DHW), is considered a household of one. Children in foster care should have adjunctive income eligibility because they are enrolled in Medicaid. Required referrals and review of proof documentation still apply to Foster children when appropriate (i.e. WISPr does not match the participant as being on Medicaid).

Local agency Coordinators may develop local procedures as needed (e.g., a procedure for maintaining the participant file).

### **CHILD IN TEMPORARY CARE**

This refers to an infant or child in temporary care of friends or relatives, but not in the legal custody of the Idaho Department of Health and Welfare, tribal authority, or other welfare entity (e.g., as in the case of families of military personnel if the absent parent(s) is serving in the military, the caregiver of the child participant is not available to care for the child). For more information, see Section B, Household Size.

### **REFERENCE**

FNS Instruction 803-3, Revision 1: Income Eligibility: Definition of Family and Economic Unit (4-1-88)  
FNS Instruction 800-1: Confidentiality - Release of Information to Applicants and Participants (3-30-90)  
WRO Policy Memorandum 803-AI: Strengthening Integrity in the WIC Certification Process (3-10-99)

## **IMMIGRANTS AND FOREIGN STUDENTS**

### **POLICY**

U.S. citizenship is not required to receive WIC services in Idaho. Legal and illegal immigrants can apply for and receive WIC services.

Foreign students may participate in WIC without incurring public charge.

The Immigration and Naturalization Service (INS) issued a statement clarifying participation in WIC does not constitute public charge and INS should not request WIC benefits be repaid by a person of alien status.

Confidentiality requirements do not allow WIC staff to report any information about WIC participation to INS or anyone else without written consent from the participant.

### **REFERENCE**

WRO All States Memorandum 98-66 (3/27/98) *Impact of Participation in the WIC Population on Alien Status (Immigrants and Foreign Students)*

## **JOINT CUSTODY**

### **POLICY**

When parents have joint custody and maintain separate households, either parent may apply on behalf of the child, provided the parent has custody of the child at least 50% of the time. The other parent cannot apply for the same child but may apply for other children or for herself if she becomes pregnant.

The benefits for the child will be provided by the local agency to one Responsible Adult, usually the parent who makes the initial contact with the WIC office. It is the responsibility of the two parents to mutually agree on sharing the child's supplemental foods. The other parent can be a proxy if the Responsible Adult requests it.

Joint custody can be complicated, particularly if the parents reside in two separate local agency service areas and custody determination changes.

For example:

Becky's parents have joint custody and each parent has 50% custody. The mother applied for WIC and Becky has been certified eligible. Becky is included when determining household size of the mother and any child support payments the mother receives are counted as income. The two parents must decide how to share the foods.

If Becky's father has remarried, he or his wife may apply for WIC benefits for other children in his new household, but not Becky. He can count Becky as part of his household size. He cannot deduct the child support he pays to Becky's mother when determining income eligibility.

### **REFERENCE**

FNS Instruction 803-3, Revision 1 Income Eligibility: Definition of Family and Economic Unit (4-1-88)

## **MIGRANCY**

### **POLICY**

Categorically eligible women, infants, and children who are members of families which contain at least one individual whose principal employment is in agriculture on a seasonal basis, who has been so employed within the last 24 months, and who establishes for the purpose of such employment a temporary abode.

A temporary abode is established when the worker's job location requires him or her to leave the place of regular residence periodically (not permanently) for one or more days. A car, van, or camper may be considered a temporary abode when used for temporary residence.

Agriculture means farming in all its branches, including logging.

This applies to migrant worker families in which all members are relocated and families in which only one member is relocated.

### **INCOME DETERMINATION**

Migrancy income determination is valid for one year.

## REFERENCE

FNS Instruction 803-14 (1988) WIC Program Certification: Eligibility of Special Populations  
WRO Policy Memo 803-X (1994) Loggers as Migrant Farm Workers

## PERSONS LIVING IN AN INSTITUTION

### POLICY

If an applicant is living in an institution, such as a mother and children temporarily living in a shelter home, she is still eligible to apply for WIC if the following conditions are met:

- WIC foods given to the participant must not be transferred to the institution's own general inventory. The foods must be available to and used by the WIC participant only.
- Food purchased with WIC checks/CVV's cannot be combined and used in group feeding.
- The institution cannot restrict the use of the supplemental food by the WIC participant or restrict participation in any WIC services.

The household size and income determination does not include the other residents of the institution. The WIC household is considered an independent economic unit from the institution.

### ELIGIBILITY OF SHELTER HOMES AND OTHER INSTITUTIONS

To the extent practical, local WIC agencies shall determine whether a homeless facility or institution complies with the conditions listed above. A full certification period may be given to an applicant without establishing the institution's compliance, but food package benefits (except infant formula) are to be suspended in subsequent certification periods if compliance has not been assured.

- Each local agency must maintain an updated master list of eligible institutions annually so staff may make referrals if an institution is found to be out of compliance.
- Local agencies should contact institutions in their area at least annually to ensure continued compliance with the conditions outlined above, as deemed necessary.

## REFERENCE

7CFR 246.7(n) Certifications of persons in homeless facilities and institutions  
ASM 803-13, WIC Program-Certification Eligibility of Persons Affiliated with Institutions, 11-27-87.

## VERIFICATION OF CERTIFICATION

### OVERVIEW

Verification of Certification (VOC) documents are intended to facilitate the transfer of currently eligible WIC participants between states and from those participants who have been participating in the program at another local agency within Idaho who fall under the status of homeless or migrant worker. An individual who has a current certification date does not have to go through the certification process until the certification period expires. A VOC document represents proof of nutritional risk.

## POLICY

Local agencies shall accept valid Verification of Certification (VOC) information and documentation from out-of-state WIC participants and certification documentation from all persons who have been participating in the WIC program in another local agency within Idaho.

Local agencies shall provide VOC information for each participating household member for whom there is an intention to relocate out-of-state during a certification period. Additionally, local agencies shall provide VOC information to out-of-state WIC agencies who request confirmation of a relocated WIC participant's certification.

## DEFINITIONS

In-state Transfer: A participant transferring from one local agency to another local agency within the state of Idaho.

Out-of-state Transfer: A participant transferring into Idaho from another state, and a participant transferring out of Idaho to another state.

## ACCEPTANCE OF VOC CARDS OR DOCUMENTS

VOC documents must be accepted as long as they have the minimum required information:

- Participant name
- Date the certification expires
- Name and address of certifying local agency

In the event that the VOC document is missing any of the above required pieces of information, the local agency may contact the previous agency for information missing from the VOC document. *A separate signed release of information is not necessary when one WIC agency contacts another WIC agency.* Information may be taken over the phone, via fax or letter from another state or local agency in order to not create a barrier to service.

Any individual who presents a valid VOC card or document must be served for the length of certification noted on the VOC document, regardless of whether he or she meets Idaho's eligibility criteria. However, the transferring participant must be categorically eligible.

Example: If the transferring participant was last certified as Breastfeeding, but has since stopped breastfeeding and her infant is greater than six months of age, the woman is not eligible as a transfer since she no longer meets the category requirement.

Example: A child whose VOC card indicates a certification period that expires after the end of the month of the child's fifth birthday is not eligible as a transfer since she/he is no longer categorically eligible.

Example: Individuals who present a VOC card or document with an expired certification date must reapply as new applicants.

## WAITING LISTS

In the event that the state of Idaho WIC Program is operating under a strict caseload management policy and is not enrolling any applicants, participants with a current VOC card or document shall be placed on the list ahead of all other waiting applicants, regardless of priority ranking. If more than one transferring participant with a current VOC card or document must be placed on the waiting list, they shall be placed in order of priority rank.

## **PROCEDURE – TRANSFER OF CERTIFICATION (VOC)**

For all transfers:

- Verify the identity and residence of the participant.
- Have the participant or Responsible Adult review and sign the Participant Rights, Responsibilities and Consent form. Participant information may be entered directly into WISPr or the application may be used.
- Educate the participant/Responsible Adult about WIC in Idaho. Issue checks/CVV's and WIC Identification Folder and explain how to use checks/CVV's, if necessary.
- Provide nutrition education and make referrals as needed.

If the participant is transferring from another clinic within the state:

- Check the certification end date. If the certification has expired, process as a new applicant. If the certification has not expired, provide the next available appointment in order to prevent a break in services.

If the participant is transferring from another state:

- If the certification period has not expired and the VOC card or document contains all of the required information, provide the next available appointment in order to prevent a break in services. Required elements:
  - Participant's name
  - Date that the current certification expires
  - Name and address of the certifying local agency
- Check the date the income eligibility was determined. A migrant worker should have income reassessed if the date is more than one year.

## **ISSUING A VERIFICATION OF CERTIFICATION DOCUMENT (VOC)**

### **VOC ISSUANCE**

Verification of Certification (VOC) documents will be issued to:

- A participant who indicates he/she will be moving out of Idaho during the current certification period
- A participant in a household with a migrant worker
- A participant in a homeless situation

VOC documents should be issued to migrant and homeless participants at certification, regardless of whether they will be moving or not.

Completed VOC documents shall, at a minimum, include:

- The participant's name
- The date the certification was performed
- The date income eligibility was last determined
- The period for which the last WIC checks/CVV's were issued
- The nutritional risk(s) of the participant

- The date the certification expires
- The signature and printed or typed name of the certifying local agency staff
- The name and address of the certifying local agency
- The VOC ID Number. This number is derived from the following information: State, Participant ID, Date and Time.

#### **MAILING OF VOC CARD**

Participants may request a VOC card after they have already moved out of state. Upon receipt of a verbal or written request, the local agency shall forward a completed VOC document to either the participant's new local agency or the participant. The order of preference regarding where VOC cards are to be mailed is as follows:

1. To the participant's new local agency, if known
2. Directly to the participant

If the request to mail a VOC card is received by mail, by fax, or verbally by phone, the local agency shall take reasonable steps to confirm the identity of the individual making the request. The local agency must document in the participant chart the address to which the VOC will be mailed or the agency where the VOC is to be faxed.

Replace the card if needed and make a note in the participant's chart describing the circumstances and solution.

#### **ISSUING DUPLICATE VOC CARD**

Local agencies shall provide participants with a duplicate VOC document *only* if the original VOC document is returned to the local agency. A comment needs to be written in the participant's chart explaining the reason for a duplicate issuance of the VOC card.

If a participant has lost his/her VOC document and applies for program benefits at a new out-of-state agency as a transfer, the participant's new out-of-state agency may contact the participant's prior local agency to verify the participant's identity and to request certification information. The prior local agency shall accommodate the new local agency's request by printing and forwarding a new VOC document by mail or fax to the new out-of-state agency.

**NOTE:** A VOC document shall not be printed and mailed to a participant who has lost a VOC which was issued in person or mailed. In the case of a lost VOC, it may only be faxed or mailed to an out-of-state local WIC agency.

#### **REFERENCE**

FNS Instruction 803-11, Rev. 1 (1988) *Verification of Certification Document*  
FNS Instruction 803-G, Rev. (1993) *Verification of Certification*  
7 CFR 246.7(k) and 7 CFR 246.25(a)

## **SECTION B: CERTIFICATION**

### **OVERVIEW**

#### **IN THIS SECTION**

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    Adjunct Income Eligibility Traditional Income Eligibility  
Required Documentation Not Available  
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Required Screening

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### **PROCESSING APPLICANTS**

#### **POLICY**

When there are funds available to provide program benefits, the local agency will:

- Accept applicants
- Arrive at eligibility determinations
- Notify the applicants of the eligibility status
- Provide nutrition education and referral
- Issue WIC checks/CVV's to eligible applicants

#### **TIMEFRAMES FOR PROCESSING APPLICATIONS**

All of the above actions will be accomplished within the following timeframes:

Pregnant women and members of migrant workers and their household members who soon plan to leave the service area of the local agency must be notified of their eligibility or ineligibility within 10 days of the date of the first request for program benefits.

All other applicants shall be notified of their eligibility or ineligibility within 20 days of the date of the first request for program benefits. The processing timeframes begin when an applicant calls or visits the local agency to make an oral or written request for program benefits. This is their initial contact date that should be accurately recorded in WISPr. Staff must document why an applicant or participant's appointment does not meet processing standards.

- An applicant who is present may be certified the same day if appointments are available. In this circumstance, the staff person should review income, residency, identification, and complete the certification in WISPr. If an application is used in the local agency, instruct the applicant to complete an Application form. Fill in the initial contact date, application date, and appointment date for WIC services in the upper left-hand corner.
- If the applicant does not complete a certification appointment at that time, when the applicant returns for the certification appointment the staff person should review income, residency, identification, and complete the certification in WISPr. If an application is used in the local agency and has not already been completed, instruct the applicant to complete an Application form. Fill in the initial contact date, application date and appointment date or WIC services in the upper left-hand corner. When an applicant calls or visits the clinic without certifying the same day, staff must ensure the initial contact date accurately reflects the first inquiry for WIC benefits in WISPr.

When a WIC participant's certification period ends, he/she must re-apply to WIC. Prior participation in WIC does not imply priority is given to those applicants. Each certification period is new.

#### **REFERRAL DATA**

Certification of nutritional risk may be based on medical data (height, weight, hematocrit or hemoglobin) from another health care provider that is less than 60 days old. The interval for the return certification will be based on the date when the medical data was taken and entered in WISPr. Pregnant women are exceptions to this rule; their return certification date is calculated six weeks (42 days) beyond the EDC.

#### **APPOINTMENT COORDINATION AND SCHEDULING**

When possible, appointments should be scheduled to coincide with other clinic appointments and transportation availability. Appointments should not knowingly require a person to take time off of work.

If an appointment is not available within processing standards in a satellite clinic due to limited clinic hours of availability, staff are required to offer an appointment at the main clinic site. Staff must document offering the appointment and if the participant declined.

#### **PREGNANT WOMEN WHO MISS FIRST APPOINTMENT**

The local agency shall attempt to contact (by phone call or by mail) each pregnant woman who misses her first appointment to apply for WIC in order to reschedule the appointment. At the time of the initial contact, the local agency shall request an address and telephone number where the pregnant woman may be contacted.

A record of this attempt must be kept.

#### **REFERENCE**

- 7 CFR 246.7 (f) Processing Standards
- 7 CFR 246.7 (b)(6) Program Referral and Access

## CERTIFYING SCHEDULE

### EXTENDING OR SHORTENING CERTIFICATION

Extending or shortening a certification period should be used in cases where there is difficulty in appointment scheduling for breastfeeding woman, infants and children. The certification period may be shortened or extended by a period not to exceed 30 days. This should occur only at the request of the participant and requests should be documented in the participant's record.

Example of scheduling difficulties may include work conflicts, poor weather conditions, or transportation issues.

### CERTIFICATION PERIOD LENGTH

- Pregnant women are certified for the duration of their pregnancy and up to the last day of the month in which the infant becomes six weeks old or the pregnancy ends.
- Breastfeeding women are certified until the last day of the month of their infant's 1st birthday or until the woman ceases breastfeeding, whichever occurs first.
- Postpartum women are certified up to the last day of the sixth month after the baby is born or the pregnancy ends.

## CERTIFYING PREGNANT WOMEN

### POLICY

Pregnant women are certified for the duration of their pregnancy and up to the last day of the month in which the infant becomes six weeks old or the pregnancy ends.

Proof of pregnancy is required for program participation if a woman is not visibly pregnant. Local agencies should issue benefits to applicants who claim to be pregnant and allow reasonable time (not to exceed 60 days) for the applicant to provide the required proof of pregnancy, provided all other eligibility criteria are met. Required proof for a woman whose pregnancy is not visibly noticeable may include an EDC written by a medical care provider or a copy of an ultrasound with an EDC.

### PREGNANT WOMAN WHO DELIVERS OR WHOSE PREGNANCY ENDS

A woman who is certified during pregnancy has a certification period that lasts until six weeks after the pregnancy ends (up to the last day of the month). Regardless of the reason the pregnancy ended (i.e. miscarriage, abortion, delivery of still birth, delivery of live birth), a woman added as pregnant can continue to receive WIC benefits and services based on the pregnancy certification for up to six weeks postpartum (up to the last day of the month). There is no time limit on pregnancies that end without a live birth. Example: If a woman had a miscarriage and has proof of that pregnancy, it does not matter how long she was pregnant (days, weeks).

To continue receiving WIC more than six weeks after the pregnancy ends, standard postpartum certification eligibility requirements apply.

Breastfeeding women may have their eligibility assessed any time up to one year postpartum.

### REFERENCE

7 CFR 246.2 Definition of Postpartum Woman  
7 CFR 246.7(g)(1) and (3) Certification Periods  
7 CFR 246.7(c)(2)(ii) Eligibility Criteria and Basic Certification Procedures

ASM 95-148 (WRO Policy Memorandum 803-AB) Categorical Eligibility and Postpartum WIC Benefits for Women Whose Pregnancy Terminated  
WRO Policy Memorandum 803-K (June 1992) *Proof of Pregnancy*

## **CERTIFYING BREASTFEEDING WOMEN UP TO ONE YEAR**

### **POLICY**

- Breastfeeding women who are less than six months postpartum will be certified up to one year, ending on the last day of the month of the breastfeeding infant's 1st birthday. Breastfeeding women over six months postpartum will be certified for up to six months, also ending on the last day of the month of the breastfeeding infant's 1st birthday.
- Breastfeeding women over six months postpartum whose infant receives >50% formula package will no longer be eligible to receive a food package; however, she will still be eligible to participate on the program.

Breastfeeding women must have a health screening between 5 and 7 months of their certification period.

Nutrition/breastfeeding education must be provided to the postpartum woman within three months after the initial certification, at the infant's 5-7 month health screen, and within three months after the infant's health screen. This schedule for providing nutrition/breastfeeding education may vary based on the mother's postpartum certification date.

Local agencies will develop a plan for implementing postpartum breastfeeding education to ensure that nutrition education occurs twice every six months.

### **PROCEDURE**

Breastfeeding woman less than six months postpartum: The computer will automatically set the end date at the breastfeeding infant's 1st birthday.

Breastfeeding woman over six months postpartum: The computer will automatically set the end date at the breastfeeding infant's 1st birthday.

Breastfeeding woman who stops nursing: See Section C.

## **CERTIFYING INFANTS**

### **POLICY**

Infants who are less than 6 months old will be certified up to 1 year of age. Infants over 6 months of age will be certified initially for a six-month period and then be certified every 12 months.

Infants must have a health screening between 5 and 7 months of age and a hemoglobin test done sometime between 9 and 12 months.

An infant under 6 months of age may be determined to be at nutritional risk if the infant's mother was a WIC program participant during pregnancy.

In addition, an infant may be determined to be at nutritional risk if the mother's medical history shows that she was at nutritional risk during pregnancy because of detrimental or abnormal medical conditions detectable by biochemical or anthropometric measurements or other documented nutritionally-related medical conditions.

## **CERTIFYING CHILDREN**

### **POLICY**

Children (ages 1 to 5) are certified up to one year and ending with the last day of the month of the child's 5th birthday. Children must have a health screening between 5 and 7 months of their certification and hemoglobin test between 15-18 months of age, ideally 6 months after the infant hemoglobin test was performed.

### **REFERENCE**

WRO Policy Memorandum (August 2011) Guidance for Providing Quality WIC Nutrition Services during Extended Certification Periods.

## **DOCUMENTATION REQUIRED AT CERTIFICATION**

### **POLICY**

Applicants must provide documentation that they meet the eligibility criteria for WIC. Staff must document that the applicant provided each of these proof documents.

The purpose of this policy is to strengthen the integrity of the WIC certification process, prevent dual participation, and make sure WIC services are provided only to those applicants who are truly eligible.

If the applicant fails to provide this documentation at the certification appointment, a 30-day temporary certification period is available. If this occurs, the participant must sign a statement declaring their income and intent to qualify for the program to receive benefits.

Providing documentation should be implemented in a manner that does not constitute a barrier to any applicant, particularly a person who is mobile, such as a homeless person, a person in the military, or a migrant.

A participant may use electronic forms or display an image on a mobile device to provide the documents approved by the Idaho WIC Program. The proof needs to be legible and contain all of the information a certifier may need to establish proof of identity, income, residency, or proof of pregnancy. Staff should look for credible sources of electronic documents such as the institution's contact information, letterhead, or logo.

### **CATEGORY**

The applicant must provide proof he or she belongs to a category served by the WIC Program. This is determined by identification and proof of pregnancy.

### **IDENTIFICATION**

Acceptable proof of identity includes:

- Social Security card
- Driver's license
- Birth certificate
- Crib card
- Government-issued identification
- Immunization record
- WIC Identification Folder

Visual identification is permissible at subsequent certifications once initial proof of identity has been established. For women participants with authorized proxies, this includes checking the identification of the proxies. For children and infants, this includes checking the identity of the parent, guardian or proxy.

## **RESIDENCE WITHIN HEALTH SERVICE AREA**

Applicants must present proof of residence in the health service area. This means establishing the physical location or address where an applicant routinely lives or spends the night.

There is no requirement for length of residency.

Acceptable proof of residency includes:

- Business letter or other postmarked mail addressed to applicant at the physical residence (not a post office box)
- Driver's license or passport
- Paycheck stub with address
- Car registration
- Current utility bill (water, electric, gas, cable TV, sewer, trash)
- Rent or mortgage receipt
- State or local document which is obtained through proof of residency

**NOTE:** Proof of residency must show the address where the applicant currently lives.

## **PROOF OF PREGNANCY**

A woman whose pregnancy is not visibly noticeable must provide documented proof of her pregnancy. An EDC written on a prescription pad or a copy of an ultrasound with an EDC is adequate proof.

## **INCOME**

Income is defined as *total gross household income*, before deductions for income taxes, employee Social Security taxes, insurance premiums, bonds, etc. The determination of the amount of a household's gross income shall not be reduced for any reason (e.g., financial hardship, medical bills, child support).

Income eligibility is determined by comparing the household/economic unit's total *gross* household income against the Income Eligibility Guidelines. Income guidelines are updated yearly and become effective on July 1. If the household income is equal to or less than these guidelines, the applicant is income eligible.

Use *net income* to determine income eligibility for self-employed persons. Net income is determined by subtracting the operating expenses from the gross income.

## **ASSESSING INCOME ELIGIBILITY**

### **DETERMINE HOUSEHOLD SIZE**

#### **Household/Economic Unit Size**

Staff shall determine the number of persons living in the household/economic unit. A household is an economic unit composed of one person or group of persons, related or non-related, who usually live together and share economic resources and consumption of goods or services to support the household. The term "household," "economic unit," and "family" may be used interchangeably, but "household" is the most accurate word to identify the economic unit.

It is possible for two households to reside under the same roof. A woman living with another person or group of persons, for example, who pays for her own living expenses can be her own household.

### **Pregnant Women**

A pregnant woman is counted as a household/economic unit of two. A woman expecting a multiple birth (more than one fetus) may be counted as three or more if she provides written confirmation of the number of fetuses from a medical care provider. This option should only be used if the woman is not income eligible when she is counted as two, but would be income eligible if the multiple fetuses were counted. Exception: If the applicant indicates that cultural, personal, or religious beliefs conflict with increasing the household size, do not count the fetus.

*Split custody:* When custody of a child is split, the child shall be considered a member of the household in which he or she lives a majority of the time (50% or more). A parent paying child support may *not* claim the child as a member of his or her household unless the child lives with that parent 50% of the time.

*Joint custody:* In joint custody, the child lives with each parent 50% of the time. Consider the child a member of the household that applies for WIC services first. The child may only be counted as participating in one household.

*Foster child:* A foster child for whom an agency has legal responsibility is counted as a household of one. Payments made by the agency for the care of the child count as the only income for the child (see Section A, Foster Children).

*Adopted child:* Count the adopted child as part of the family household who adopted the child.

*Absent military personnel:* Military personnel serving overseas or assigned to a military base and temporarily absent from the household should be counted in the household/economic unit. Income received by these military personnel *should be counted as income*.

*Child in temporary care of family or friends:* This refers to an infant or child in temporary care of friends or relatives, but not in the legal custody of the Idaho Department of Health and Welfare or other welfare entity (e.g., as in the case of families of military personnel if the absent parent is serving in the military, the caregiver of the child participant is not available to care for the child). Staff should use either of the following options, depending on individual household circumstances:

- Count the absent parents and children in the household size as would have been the case prior to the parents' departure. Use of this option depends on whether staff is able to reasonably determine income from documentation provided by the friends or relatives who are caring for the child(ren).
- If the first option is not feasible, consider the child(ren) to be part of the temporary caretaker's household.

### **Residents of an Institution**

A group of residents of a homeless facility or an institution shall not be considered as one household. An individual or group of individuals (e.g., a woman and two children) who reside in a homeless facility or an institution are counted as a separate household.

### **ADJUNCT INCOME ELIGIBILITY**

Assess adjunct eligibility on the basis of eligibility to receive Medicaid (MA), SNAP, Child Health Insurance Program (CHIP), or Temporary Assistance for Needy Families in Idaho (TANF).

**NOTE:** Adjunct eligibility is determined by verifying participation in or pending status approval for participation in any one of the above-mentioned programs.

By law, persons and/or certain household members certified as eligible for some assistance programs at the time of WIC application are adjunctively income eligible for WIC. These applicants are not subject to the income guidelines used in Traditional Income Eligibility. Because these programs generally document income, their use for WIC income eligibility determination helps strengthen the integrity of the WIC income eligibility determination process without undue burden to WIC.

An applicant is adjunctively income eligible for WIC if documentation shows that the individual is one of the following:

- Certified as fully eligible to receive benefits from Medicaid (MA), SNAP, Child Health Insurance Program (CHIP) or Temporary Assistance for Needy Families (TANF).
- Determined to be presumptively eligible for the above-mentioned programs pending completion of that program's eligibility process.
- A member of a household containing:
  - a TANF recipient
  - a pregnant woman or infant currently on Medicaid
- An infant born to a woman with current proof of participation in Medicaid is deemed income eligible for their first year of life.

Category	Medicaid	TANF	Food Stamps
Pregnant woman	Self and household members	Self and household members	Self
Postpartum woman (Breastfeeding and Non-Breastfeeding)	Self and infant	Self and household members	Self
Infant	Self and household members	Self and household members	Self
Child	Self	Self and household members	Self

Proof of adjunct income eligibility based on eligibility in Medicaid, SNAP, Child Health Insurance Program (CHIP) and/or Temporary Assistance for Needy Families (TANF) must be confirmed at the time of application. Self-declaration is not sufficient. Documentation must accurately represent current eligibility for participation in such a program.

Documentation may include:

- Computer system match
- Notice of eligibility letter or card showing current eligibility dates
- Online or telephone access to adjunct programs which indicate current status

Quest cards by themselves are not adequate because they do not include the period of eligibility. They are acceptable if they can be scanned on a machine to show the eligibility period.

**NOTE:** WIC staff must obtain a verbal report of income for households where applicants are adjunctively income eligible. If the verbally reported income exceeds the upper limit for the household size but there is proof the applicant is adjunctively eligible, enter the verbally reported household income.

### TRADITIONAL INCOME ELIGIBILITY

If an applicant is not adjunctively income eligible or staff is unable to substantiate adjunct income eligibility with the information provided, Traditional Income Eligibility screening is required. In order to apply the guidelines, household size and total income must be determined.

- Income eligibility determination is based on gross income received 30 days prior to application for WIC services.
- Annual income is used if household income fluctuates due to seasonal work, periodic layoffs, or self-employment.
- Net income is used for self-employed people.

Local agencies should request that applicants bring income documents which cover the period for the previous 30 days to the certification appointment. The local agency may choose to use income documentation which covers more than 30 days if this better reflects the applicant's income at the time he/she is applying for WIC services (includes periods of unemployment such as layoffs, maternity leave or seasonal work). Do not include future income or changes in income that may happen in the future except in rare circumstances where income available to the family within the next 30 days is the only way to accurately capture their income. For example, if the sole supporter of the family was laid off and has been authorized to receive unemployment benefits for the next six months, and these changes have not yet been reflected in the past 30 days of income. In the event these special circumstances arise, follow up with your coordinator or supervisor (see Source of Income Chart below).

**NOTE:** In some situations, an individual may be recently laid off and not have their income changes reflected in the past 30 days. Idaho WIC policy is to not look at future income. However, there are some case-by-case considerations where "current" may be considered income available to the family within the next 30 days. For example, if the sole supporter of the family was laid off and has been authorized to receive unemployment benefits for the next six months. In the event these special circumstance arise, follow-up with your coordinator or supervisor.

If the applicant does not bring income documents to the certification appointment, a verbal income may be taken and recorded at the time of certification. For income eligibility, an applicant may self-declare their household income via a signed statement on the No Proof and Temporary (Income) Certification Form under the Temporary or Forgot Documents (Income only) section (Section B). Staff must assess the applicant(s) eligibility based on the self-declared household income and, if they are determined to be eligible based on that value, may issue them up to 30 days of benefits. If the required proof is not brought in within 30 days, no second, subsequent 30 day certification may be granted and the certification will end.

If an applicant reports zero income or has no proof of income, the applicant must sign a *No Proof & Temporary (Income) Certification* form declaring this (see Zero Income in this section).

Local agency staff will need to compare income to the published Income Eligibility Guidelines (IEGs) in the following ways:

1. If a household has only one income source, or if all sources have the same frequency, do not use conversion factors. Compare the income, or the sum of the separate incomes, to the published IEGs for the appropriate frequency and household size to make the WIC income eligibility determination.
2. If a households reports income sources at more than one frequency, perform the following calculations:
  - a. Annualize all income by multiplying weekly income by 52, income received every two weeks by 26, income received twice a month by 24, and income received monthly by 12
  - b. Do not round the values resulting from each conversion
  - c. Add together all the unrounded, converted values
  - d. Compare the total to the published IEGs (annual income for the appropriate household size) to make the final income eligibility determination

The following chart describes how to handle different combinations of the above.

If the pay frequency is:	AND the amount is:	DO this:	To Annualize: <sup>^</sup>
Monthly	Always the <b>same</b> and <b>different</b> (income eligible)	Compare to Income Eligibility Guidelines (IEGs)	Multiply one check by 12
	<b>Different</b> and over income~	*Add 3 checks together and divide by 3, then compare to IEGs.	Add 3 checks together and multiply by 4
Every 2 weeks	Always the <b>same</b>	Compare to Income Eligibility Guidelines (IEGs)	Multiply check by 26
	<b>Different</b>	*Add 2 checks together and divide by 2, then compare to IEGs.	Add 2 checks together and multiply by 13
Twice each month	Always the <b>same</b>	Compare to Income Eligibility Guidelines (IEGs)	Multiply check by 24
	<b>Different</b>	*Add 2 checks together and divide by 2, then compare to IEGs.	Add 2 checks together and multiply by 12
Weekly	Always the <b>same</b>	Compare to Income Eligibility Guidelines (IEGs)	Multiply one check by 52
	<b>Different</b>	*Add 4 checks together and divide by 4, then compare to IEGs.	Add 4 checks together and multiply by 13
Combination of incomes with <b>same</b> frequency		Calculate separately as described above and add together, then compare to the IEGs	
Combination of incomes with <b>different</b> frequency			Calculate separately as described above and add together

~ If the participant is determined over income with the 1 month of income and is paid a different amount each month, ask the participant to return with 3 months of income to better determine their income situation.

\*Note: In most cases this will work, but further inquiry about income amounts may be necessary. Need to assess if this income is the most reflective of the normal situation. Seek assistance from your supervisor, Coordinator, or the State agency if you have questions.

<sup>^</sup> All income does not need to be annualized. Use if all income frequency is different or it better reflects the participant's situation.

Source of Income	Examples of Acceptable Proof of Income
Salary, wages, tips, commissions, bonuses	Current pay stub(s) with information about pay timeframe (e.g., weekly, bi-weekly, monthly) Signed statement from employer indicating gross cash earnings for a specified period
Net income from self-employment	Income tax return for the most recent calendar year Accounting records for the self-employed
Regular cash contributions from persons not living in the household	Letter from person contributing resources to the household
Child support payments or alimony	Divorce decree Award letter Copy of check received

Cash assistance payment(s)	Decision letter Quest card
Social Security benefits	Check stub Award letter from Social Security stating current amount of earnings Bank statement
Foster care	Foster child placement letter Foster parent award letter
Student financial assistance, such as grants and scholarships. Certain grants and loans will not be counted as income.	Award letter Scholarship letter
Unemployment compensation	Unemployment letter or notice
Active military payments	Recent Leave and Earnings Statement Pay stubs, vouchers, allotments or bank statements confirming the amount of deposit
Net rental income	Income tax return for the most recent calendar year
Dividends or interest on savings or bonds, income from estates, trusts or investments	Income tax return for the most recent calendar year Bank or account statements
Private pensions or annuities	Income tax return for the most recent calendar year
Government civilian employee or military retirement or pensions or veteran's payments	Annual statement that shows monthly amount of retirement income
Other cash income such as withdrawals from savings, investments, trust accounts and other resources that are readily available to the	Bank account statements indicating regular draws on the account(s)

## INCOME INCLUSIONS

Income includes the following:

- a. Money received for services, including wages, salaries, commissions and fees
- b. Net income from farm and non-farm self-employment (see Self Employed in this section)
- c. Social Security benefits, including payments for disabled individuals
- d. Dividends or interest on savings, bonds, estates, trusts, or net rental income
- e. Public assistance or welfare payments
- f. Unemployment compensation
- g. Government civilian employee or military retirement, pensions, or veterans payments
- h. Private pensions or annuities
- i. Alimony or child support payments
- j. Regular contributions from persons not living in the household
- k. Net royalties
- l. Student financial assistance (loans or grants) intended to pay for room, board, or dependent care expenses
- m. Other cash income which includes, but is not limited to, cash amounts received or withdrawn from any source, including savings, investments, trust accounts, and other resources which are readily available to the household
- n. Military cash allowances for uniforms and food
- o. Insurance settlement, unless providing reimbursement for lost property or expenses
- p. Lump sum payments that represent *new* income such as gifts, inheritance, lottery or sweepstake winnings, worker's compensation for lost income and severance pay (see Income Exclusions in this section for more detail)
- q. Reenlistment bonuses (if received as a lump sum, take the bonus and divide by 12 to add to the monthly amount)

## INCOME EXCLUSIONS

Income does not include the following:

- a. Child Care: Any child care payments from the following:
  - Title IV-A Child Care Program
  - Idaho Child Care Program (child care assistance paid to low income working parents)
  - At-Risk Child Care Programs
  - Child Care Development Block Grant
- b. Compensation
  - Payments made under the Disaster Relief Act of 1974, as amended by the Disaster Relief and Emergency Assistance Amendments of 1989
  - Payment received due to the Agent Orange Compensation Exclusion Act
  - Payment received from Wartime Relocation of Civilians under the Civil Liberties Act of 1988 (Japanese Internment Camps)
  - Payment received from National Flood Insurance Program per Public Law 109-64
- c. Elderly
  - Payments received under the Old Age Assistance Claims Settlement Act, except for per capita shares in excess of \$2,000.00
  - Payments received under the Judgment Award Authorization Act
- d. Food Assistance: The value of assistance to children or their families from the following programs
  - School Lunch Program
  - Summer Food Service Program
  - Child and Adult Care Food Program
  - Special Milk Program
  - School Breakfast Program
  - SNAP Program
  - Food Distribution Program (e.g., on Indian Reservations)
  - Food Bank Programs
- e. Housing
  - Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970
  - Payments received under the Cranston-Gonzales National Affordable Housing Act, unless the household's income equals or exceeds 80% of the median income of the area
  - Payments received under the Housing and Community Development Act of 1987, unless the household's income increases at any time higher than 50% of the median income of the area
  - Payments of allowances received from the Home Energy Assistance Act of 1980
  - (See Military)
- f. Job Training: Payments received under the Job Training Partnership Act from the following programs
  - Adult and Youth Training Programs
  - Summer Youth Employment and Training Programs
  - Dislocated Worker Programs
  - Programs for Native Americans
  - Migrant Seasonal Workers Programs
  - Veterans Employment Programs

- Job Corps

g. Lump Sum Payments

- Earned Income Credit (EIC), a tax credit for families who work and have children
- Lump sum payments that represent reimbursements including those received from insurance companies for loss or damage of property and payments of medical bills resulting from an accident or injury. If the lump sum payment cannot be easily placed into one category (reimbursement or new money), determine what portion of the payment is reimbursed and what portion is considered new income. Do not count the reimbursement amount as income. Do count the amount which is new money as income.
- Federal tax refunds.

h. Military

- Mandatory salary reduction amount for military service personnel which is used to fund the Veteran's Educational Assistance Act of 1984 (G.I. Bill) as amended
- Military housing allowances (Basic Allowance for Housing-BAH; Family Separation Housing Allowance-FSH)
- In-kind housing or other in-kind benefits (e.g., military on-base housing, medical services)
- Family Subsistence Supplemental Allowance (FSSA)
- Outside Continental United States Cost of Living Allowance (OCONUS COLA)
- Pay and allowance continuation for wounded, ill, and injured (PAC)
- Deployment Extension Incentive Pay (DEIP)/ Deployment Extension Stabilization Program (DESP) payments only while deployed. Payments from this program are considered income once the service member returns to a base in the United States.
- Combat pay
- For an exhaustive list of military income exclusions, please visit the following website: [www.fns.usda.gov/snap/rules/Memo/2005/011405.htm#2](http://www.fns.usda.gov/snap/rules/Memo/2005/011405.htm#2)

i. Native Americans: Payments to the Confederated Tribes and Bands of the following Native American Tribes

- Yakima Indian Nation
- Apache Tribe of the Mescalero Reservation
- Grand River Bank of Ottawa Indians
- Passamaquoddy Tribe
- Penobscot Nation
- Sac and Fox Indians (claims agreement)
- Navajo and Hopi Tribes (relocation assistance)
- Turtle Mountain Band of Chippewas (Arizona)
- Blackfeet Tribe (Montana)
- Gros Ventre Tribe (Montana)
- Assiniboine Tribes (Montana)
- Papago Tribe (Arizona)
- Red Lake Bank of Chippewas
- Saginaw Chippewa Indian Tribe (Michigan)
- Chippewas Tribe (Mississippi)

Income derived from certain submarginal land of the United States which is held in trust for certain Native American tribes

j. Payments received under the Alaska Native Claim Settlement Act

- k. Student Financial Assistance: Student loans and grants used for tuition, student fees, the costs for rental or purchase of any required equipment, materials or supplies, books, transportation, and miscellaneous personal expenses for a student attending the institution on at least a half-time basis. Following are examples of student loans and grants that are not counted as income:

- Pell Grant
- Supplemental Educational Opportunity Grant
  - State Student Incentive Grants
  - Stafford Loans
  - PLUS
  - Supplemental Loans for Students
  - College Work Study
  - Byrd Honor Scholarships
  
- I. Short-term, Non-secured Loans: Excludes loans to which the applicant does not have constant or unlimited access to monies.
  
- m. Vocational Education: Payments received under the Carl D. Perkins Vocational Education Act and the Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990
  
- n. Volunteers
  - Any payment to volunteers under Title I (VISTA and others) and Title II (Retired Senior Volunteer Program, foster grandparents, Senior Companions Program, and others)
  - Payment to volunteers under Section 8 of the Small Business Act (SCORE and ACE)

#### **CASH INCOME**

If an applicant reports cash income payments, he or she should still provide documentation from the employer, if possible.

Request the applicant to have employer provide a written document which acknowledges the employment and rate of pay and number of hours worked. If unable to obtain, ask applicant to write a statement which describes the compensation in terms of hourly rate and number of hours worked.

#### **INCOME CONFIRMATION FROM EMPLOYERS**

To confirm income means directly contacting the source of income (e.g., employer) to determine if the documentation provided by the applicant is accurate and complete.

Staff may confirm income reported by applicants or participants when there is reason to suspect the applicant or participant is intentionally misrepresenting income. The reason for making such inquiry must be documented in the applicant/participant file. Reasons may include, but are not limited to:

- Applicant is paid in cash
- Contradictory information is given by applicant or participant
- Complaint made by another individual
- Information WIC staff may have about the financial situation of the applicant or participant

#### **MIGRANT WORKERS**

Migrant workers' income is valid for one year. A migrant worker is an individual whose principle employment is in agriculture on a seasonal basis, who has been employed within the last 24 months, and who establishes, for the purpose of such employment, a temporary abode. Agriculture means farming in all of its branches, including logging.

This applies to migrant worker families in which all members are relocated and to families in which only one member is relocated.

## SELF-EMPLOYED

Net income is used to make income eligibility determinations for self-employed applicants or household members. Net income is calculated by subtracting the self-employment operating expenses from the gross receipts during the past twelve (12) months.

If the applicant is unable to provide the operating expenses and gross receipts for the past twelve (12) months, net income from the preceding year's Federal income tax return may be used only as a basis for the income determination. In such cases, the applicant is required to adjust the net income from the previous year as necessary to better reflect actual income over the past year. If using an income tax statement, the net income is listed on the 1040 U.S. Individual Income Tax Return under Farm Income.

Farm Income: Gross receipts include:

- Value of all products sold
- Rent received from farm land, equipment, or buildings
- Receipts from the sale of items such as wood, sand, gravel, etc.

Operating expenses include:

- Cost of feed, fertilizer, seed and other farming supplies
- Wages paid to migrant workers
- Depreciation (must be documented on income tax return)
- Rent paid for farm land, equipment or buildings
- Interest on farm mortgages
- Cost of farm building repairs
- Farm taxes

Non-Farm Income: Gross receipts include, but are not limited to:

- Value of goods sold or services rendered by the business

**NOTE:** The value of services and merchandise which are consumed by the household are not considered operating expenses. If using an income tax statement, the net income is listed on the 1040 U.S. Individual Income Tax Return under Business Income or Loss.

## STUDENT APPLICANTS

If a student applicant is found to be income eligible using the Traditional Income Eligibility status, continue with the certification. If the student applicant is found to be over income, subtract school-related expenses described above, then annualize the income and compare this value to the annual Income Eligibility Guidelines (IEGs).

## TEENAGE APPLICANTS

A teenage applicant is someone who is less than 18 years old at the time of WIC application.

For teenage applicants residing at home with parent(s), determine if the total household income is within income eligibility limits. If the teenage applicant is supported by her parents, the parent's income should be included in the household income.

## ZERO INCOME

If an applicant reports zero income, ask additional questions to determine if there is any financial assistance or other support for living expenses.

If there is financial support provided by others, consider this information for income eligibility determination.

If the income is zero, the applicant must complete a *No Proof & Temporary (Income) Certification form* which declares that he/she has zero income. A copy of this form should be kept with the applicant record.

## REFERENCE

Idaho Administrative Code – Department of Health and Welfare: IDAPA 16.03.01 Eligibility for Health Care Assistance for Families and Children; Section 530 Newborn Child Deemed Eligible for Medicaid, 2014.

ASM, 00-48, Publication of New WIC Income Poverty Income Guidelines, 3/30/00.

7 CFR 246.7(2)(D) Verification (of Income) and Exclusions

7 CFR 246.7(h) Actions affecting participation in mid-certification

FNS Instruction 803-3, Revision 1: WIC Program Certification: Income Eligibility 05/98. FNS

Instruction 803-14: WIC Program Certification: Eligibility of Special Populations, 1988 FNS

Instruction 803-L: Lump Sum Payments as Income, 1992.

FNS Instruction 803-Q: Child Care Payments Excluded from Income Consideration in WIC, 2/19/93.

FNS Instruction 803-X: Loggers as Migrant Farm Workers, 1994

FNS Instruction 803-AI [All States Memo 99-54 (1999)]: Strengthening Integrity in the WIC Certification Process

FNS Instruction 803-AS, Rev. 2: Treatment of Family Subsistence Supplemental Allowance in WIC Income Eligibility Determination

FNS Instruction 803-AV: WIC Income Eligibility Determinations for Households Affected by Privatization of On-Base Military Housing, April 2002

FNS Instruction 803-AX: Family Size and Income Determination for Military Families, March 2003 FNS

Instruction 803-AY: Exclusion of the Earned Income Tax Credit (EITC) from Income Eligibility

Determinations for the WIC Program, August 2003

WIC Policy Memorandum 2010-02: Implementation of Public Law 111-80; Exclusion of Combat Pay from WIC Income Eligibility Determination

## REQUIRED DOCUMENTATION NOT AVAILABLE

### POLICY

Forgot to Bring Required Written Documentation:

If the applicant forgets to bring the required written proof of identity, pregnancy, residence, or income, but verbally provides information that appears to make him or her eligible, a temporary, one-month certification may be granted. For income eligibility, an applicant may self-declare their household income via a signed statement on the No Proof and Temporary (Income) Certification Form under the Temporary or Forgot Documents (Income only) section (Section B). Staff must assess the applicant(s) eligibility based on the self-declared household income and, if they are determined to be eligible based on that value, may issue them up to 30 days of benefits. If the required proof is not brought in within 30 days, no second, subsequent 30 day certification may be granted and the certification will end. If a woman initially forgot proof of pregnancy documents, but is now visibly pregnant, they are not required to provide written proof of the pregnancy. Refer to Ineligible at Mid- certification in Section E of this chapter.

There are no instances where a second, subsequent 30-day certification period may be used if the applicant fails to provide the required documentation of income. The same policy applies to applicants who fail to produce documentation of residency or identity.

Cannot Provide Required Documentation:

In some situations, the applicant may not be able to provide the required proof for identity, residence or income (for example: homeless, migrant workers). The applicant must explain why he or she is not able to provide proof and a No Proof & Temporary (Income) Certification form must be completed under the

“Cannot Provide Documents” section.

## REFERENCE

Policy Memo 803-AI (1999) Strengthening Integrity in the WIC Certification Process

## CERTIFICATION PROCEDURES

### POLICY

Certification procedures are outlined in greater detail in the Idaho WIC Program Paraprofessional Training Manual.

### NEW APPLICANT

New applicants physically present may be entered directly into WISPr. The application is not required and use of the form is at the discretion of the local agency.

- WIC Participant Rights, Responsibilities and Consent
  - Required for all agencies
  - One per household
- Application for WIC
  - Optional per agency
  - One per household

### RIGHTS, RESPONSIBILITIES AND CONSENT

The Rights, Responsibilities and Consent form is required to be reviewed and signed by the Responsible Adult with every certification. The Authorized signer must sign when they are added as a second signer. A proxy must also sign the Rights, Responsibilities and Consent form.

In order to inform applicants, participants or caretakers of WIC program rights and responsibilities, the following information is required to be provided. These approved federal statements must be read as they are written here:

- I. “Standards for eligibility and participation in the WIC Program are the same for everyone, regardless of race color, national origin, age, handicap, or sex.”
- II. “You may appeal any decision made by the local agency regarding your eligibility for the Program.”
- III. “The local agency will make health services, nutrition education and breastfeeding support available to you, and you are encouraged to participate in these services.”

Staff must ensure all applicants, participants or caretakers receive the same verbiage. After reading these statements, the Responsible Adult must be given the opportunity to read and review the entire form and ask questions.

This form must be signed at the beginning of the certification appointment. Signing acknowledges notification of program responsibilities such as fraud and dual participation. Additionally, signing the form means the participants consents to:

- The collection of anthropometric and biochemical data by WIC staff.

- Authorization to share eligibility information (such as name, address, income level and birth date) with local, state, and federal WIC programs. This information may also be shared with the Idaho Department of Health and Welfare's Medicaid, SNAP and Title X Family Planning programs for the purpose of referral.
- Authorization to share immunization status with the Immunizations Program for referral purposes.
- Authorization to use health data and eligibility information for receiving WIC services and for evaluating the effectiveness of the program, monitoring, and auditing the program.
- Authorization to contact them, for example leave a voicemail message or text message, at the phone number provided to WIC.

Where a significant number or proportion of the population eligible to be served needs the information in a language other than English, reasonable steps shall be taken to provide the information in appropriate languages to such persons, considering the scope of the Program and the size and concentration of such population.

## REFERENCE

CFR 246.7(j)(2) Notification of participant rights and responsibilities.

## PHYSICAL PRESENCE REQUIRED AT CERTIFICATION APPOINTMENT

A local agency shall ensure that WIC applicants and/or participants are physically present at all certification appointments, with limited exemptions. In the case of infants and/or children, a parent or caretaker shall also be present.

Exemptions:

Infants under 8 weeks of age who cannot be present at certification for a reason determined culturally appropriate by the local agency and for whom all necessary certification information is provided may be exempt from the physical presence requirement.

Local agency staff shall require the parent and/or caretaker to bring the infant to the next appointment after the infant reaches 8 weeks of age unless the infant has been present at the WIC agency or been determined to fall within one of the other exemption reasons as stated below.

Participant(s) may be exempt from the physical presence requirement for WIC certification if being physically present would pose an unreasonable barrier to current participation under the following circumstances:

A participant or parent/caretaker of a participant who is a qualified individual with a disability as defined by the Americans with Disabilities Act. Examples are:

- a medical condition that necessitates the use of medical equipment that is not easily transportable
- a medical condition that requires confinement to bed rest
- a serious illness that may be exacerbated by coming into the WIC site
- a serious illness that is highly contagious (e.g., tuberculosis)

The infant or child applicant is under the care of one or more working parents or primary caretakers whose working status presents a barrier to bringing the infant or child into the WIC office. In two-parent/caretaker families, both parents/caretakers must be working and it must present a barrier to participation for the infant/child if neither person were able to leave work and bring the infant/child to the certification appointment.

**NOTE:** All applicants/participants with disabilities are not automatically exempt from physical presence at certification. Only those persons with a disability that creates a current barrier to the physical presence requirement may have a basis for exemption. All exemptions must be documented by a medical care provider. Documentation must include date, diagnosis, and reason for inability to come into the WIC site.

## **DETERMINE ELIGIBILITY**

Determining if applicant is eligible based upon category, residence in health service area, and income is done first. This process does not require using a CPA. It can be done by any trained WIC staff person.

If the applicant does not meet one or more of the above eligibility requirements, give him/her a Letter of Ineligibility at this time.

If the applicant is eligible, complete the eligibility documentation within WISPr and continue with the certification by conducting the health screening and determining nutritional risk.

## **ELIGIBLE APPLICANT CERTIFICATION PROCEDURES**

An applicant who has met the eligibility requirements (for category, residence, and income) now has a nutrition assessment to complete the fourth component of eligibility.

- Conduct a health screening by collecting nutrition-related information:
  - Height and weight
  - Blood test
  - Nutrition assessment
- Determine the nutritional risk of the participant. Document the findings in the chart and computer. If the applicant does not have at least one nutritional risk criteria, give him or her a Letter of Ineligibility at this time.
- If the applicant has one or more nutritional risk criteria, print and sign the Certification Record/Care Plan. The person is now eligible for WIC services.
- Educate the participant about WIC, including a review of Participant Rights and Responsibilities. Issue checks/CVV's and WIC Identification Folder and explain how to use the checks/CVV's. Provide nutrition education, make referrals, and schedule follow-up as needed.
- If migrant or homeless, issue a VOC document.

## **REFERENCE**

7CFR246.7(p)(1)(2)

WRO Policy Memorandum 803-BA, Implementation of the Certification and General Administration Provisions of P.L. 108-265

## REQUIRED REFERRALS

### POLICY

WIC benefits include providing applicants and participants with written and verbal referral information. Required referrals at certification, as applicable, include:

- Medicaid (MA)/Child Health Insurance Program (CHIP)
- Food Stamps
- Immunization (IM)
- Temporary Assistance for Needy Families – TANF/TAFI/Cash Assistance (TA)
- Drug and Other Harmful Substance Abuse (SA)
- Others, as needed

### DOCUMENTATION

All referrals should be documented on the Verification of Certification screen and on the Certification/Care Plan form.

### MEDICAID, SNAP, CHIP

At certification, each participant or Responsible Adult must be provided referral information about Medicaid and SNAP, and caretakers of children must receive information about CHIP.

### IMMUNIZATION

At initial certification and all subsequent certification visits for children under the age of two, screen the infant/child's immunization status using a documented record. A documented record is a record (computerized or paper) in which actual vaccination dates are recorded. This includes a parent's hand-held immunization record (from the provider), an immunization registry, an automated data system, or a participant's paper chart (paper copy).

At minimum, screen the infant/child's immunization status by counting the number of doses of DTaP (diphtheria, and tetanus toxoids and acellular pertussis) vaccine they have received in relation to their age, according to the following table:

By 3 months of age	1 dose of DTaP
By 5 months of age	2 doses of DTaP
By 7 months of age	3 doses of DTaP
By 19 months of age	4 doses of DTaP

If the infant/child is not current on the above listed minimum screening protocols: 1) provide information on the recommended immunization schedule appropriate to the current age of the infant/child, 2) provide referral for immunization services, ideally to the child's usual source of medical care, and 3) encourage the parent/caretaker to bring the immunization record to the next certification.

**NOTE:** It is not the intent of this policy to replace more comprehensive immunization screening, assessment, and referral activities that may already be in place at the local agency level, but to clarify the minimum required by WIC regulation. Local agencies are encouraged to coordinate efforts with local agency Immunization programs and per the State Memorandum of Understanding (MOU). Coordination of screening and referral for immunizations may be facilitated through a formal MOU that outlines the responsibilities of the State Immunization program and the WIC program. WIC offices in district health departments must maintain a copy of the immunization history for each WIC child, as specified in the current MOU.

## **DRUG AND OTHER HARMFUL SUBSTANCE ABUSE**

Drug and other harmful substance abuse screening, education, and referral are integrated into the certification process for pregnant women and into nutrition education activities for pregnant, postpartum, and breastfeeding women, and to parents or caretakers of infants and children participating in the program.

## **REQUIRED SCREENING**

### **POLICY**

#### **SCREENING AND REFERRAL AT CERTIFICATION**

All potentially eligible pregnant women will be screened for drug and other harmful substance abuse at certification by completing the nutrition assessment process for pregnant women. Screening is completed so that appropriate referrals can be made.

If a potentially eligible pregnant woman has concerns about her drug use or harmful substance abuse or if the nutrition assessment process identifies a potential problem with drugs or other harmful substance abuse, a referral must be made.

Local agencies must maintain a current list of local substance abuse counseling and treatment services. This must be printed and updated on at least an annual basis. The referral information may be included in a comprehensive written list of important local community resources that is used as a handout for participants.

### **EDUCATION**

Local agencies must provide drug and other harmful substance abuse information to all pregnant, postpartum, and breastfeeding women, and to parents or caretakers of infants and children participating in the program. This information may be provided through handouts or information included in participant newsletters.

### **REFERENCE**

7CFR 246.7 (a) Integration with health services  
7CFR 246.7 (b) Program referral and access  
7CFR 246.7 (o) Drug and other harmful substance abuse screening  
7CFR 246.11 (a)(3) General nutrition education  
ASM 01-56 (WRO Policy Memo 803-AT) Immunization Screening and Referral in WIC

## **SECTION C: MID-CERTIFICATION**

### **OVERVIEW**

#### **IN THIS SECTION**

Category Changes in Women  
Change in Custody  
Change in Income  
Ineligible at Mid-Certification

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### **CATEGORY CHANGES IN WOMEN**

#### **POLICY**

##### **PREGNANT WOMAN WITH EDC CHANGE**

- If the EDC changes by less than two weeks, no changes need to be made to the computer system.
- If the EDC changes by two weeks or more, staff should adjust the dates on the computer system.

##### **PREGNANT WOMAN WHO DELIVERS OR WHOSE PREGNANCY ENDS**

Women who miscarry are treated the same as non-breastfeeding postpartum women.

Non-breastfeeding women who were not on WIC during pregnancy may be certified any time up to six months after the pregnancy ends (up to the last day of the month), even if the baby died or is no longer with the mother. There must be written documentation that a pregnancy existed.

##### **BREASTFEEDING WOMAN WHO NEEDS A BREAST PUMP (MANUAL OR ELECTRIC)**

Women and infants who require a breast pump to support breastfeeding must both be certified eligible to participate in WIC to receive a manual pump or rented electric pump.

If the woman is not enrolled in WIC, she cannot receive a WIC breast pump until she and her infant have been certified.

If the woman is certified as a pregnant woman and she has recently delivered but has not yet had her postpartum WIC eligibility determined, she may receive a breast pump prior to being certified as a breastfeeding woman. Both mother and baby should be scheduled for certification within six weeks of the delivery.

## **BREASTFEEDING WOMAN WHO BECOMES PREGNANT**

A breastfeeding woman who is fully breastfeeding and receiving Food Package 7 may remain as category B until she is one year postpartum and no longer categorically eligible as a breastfeeding woman. At that time, she should be certified as a pregnant woman.

A breastfeeding woman who is not receiving a Food Package 7 should be certified as a pregnant woman. Staff should remember to use Nutrition Risk Criteria 338, Pregnant and Breastfeeding, and other criteria as applicable.

## **BREASTFEEDING WOMAN WHO STOPS NURSING**

A breastfeeding woman who stops breastfeeding is in one of three situations described below:

- A. A breastfeeding and nutrition assessment must be conducted to determine the appropriate food package to issue her and her infant. If she is greater than six months postpartum and her infant receives >50% formula package, she will no longer be eligible to receive a food package. However, she will still be eligible to participate on the program and receive appropriate nutrition/breastfeeding education and health referrals.
- B. If she is less than six months postpartum and was eligible based solely on her infant, she must have a breastfeeding and nutrition assessment completed to establish if she is still eligible to receive WIC benefits.
- C. If she is less than six months postpartum and qualified because of her own risks, she may be kept on WIC with a new breastfeeding and nutrition assessment completed. Any Nutrition Risk Criteria which apply only to breastfeeding women should be removed.

## **NON-BREASTFEEDING POSTPARTUM WOMAN WHO RESUMES BREASTFEEDING**

A non-breastfeeding woman who notifies staff she has resumed breastfeeding is in one of two situations described below.

- If she previously qualified as a breastfeeding woman and the timeframe is still within that original certification period, she may be kept on WIC with a new breastfeeding and nutrition assessment completed. Any Nutrition Risk Criteria which apply only to non-breastfeeding postpartum women should be removed.
- If she has not previously qualified as a breastfeeding woman, she must have a breastfeeding and nutrition assessment completed to establish if she is still eligible to receive WIC benefits.

It is acceptable to make the changes when she notifies staff of the change or to make another appointment. It is preferred to do it when she notifies staff, but not always possible.

## **CHANGE IN CUSTODY**

### **POLICY**

WIC benefits shall be issued to the Responsible Adult of the child and/or infant assigned at the initial certification.

The responsible adult may assign an Authorized Signer or utilize a Proxy under applicable circumstances during a certification period. The Responsible Adult should not change mid-certification unless there are extenuating circumstances. Foster situations are handled separately from this guidance, see policy for foster children under Section A - Eligibility.

Proof of custody shall be required in order to assign active participants to another Responsible Adult mid-certification.

Acceptable documentation:

- A copy of court or other legal document(s)
- An official document such as a copy from the office of Family and Children's Services (FACS) showing the new guardian's name

When legal documentation is not available:

- Staff may obtain a written note from the previous Responsible Adult regarding the change.
  - **EXAMPLE:** Parent leaves the child with a relative for a specified period of time. Local agency staff may accept a signed note from the parent stating the change of custody.
- Staff may contact the previous Responsible Adult using the contact information provided to WIC in order to obtain a verbal authorization to change custody.
- Staff may need to contact the social worker, case manager, public health nurse, or other appropriate individual to confirm custody.

If staff is unable to obtain court documents or verify custody within three (3) days, the person with physical custody of the child at the WIC appointment is determined to be the guardian for the purpose of issuance of WIC benefits.

If there is a custody dispute, issue benefits to the Responsible Adult on file for the current certification period. Joint custody must be handled between the caretakers; generally whoever the initial Responsible Adult is will be issued benefits and should divide the resources appropriately. The person(s) disputing the custody must supply records to the clinic that prove that they have custody. In this situation, it is recommended to only issue one month of benefits at a time until the custody dispute is resolved, however, benefits cannot be withheld because of staff suspicions related to a custody dispute.

**NOTE:** The WIC Program's role is only to determine to whom benefits should be issued based on the information WIC staff have available, not to determine any custody issues.

- In the event it is appropriate to change custody to a new Responsible Adult mid-certification staff must:
- Verify proof of identity.
- Determine if household income and number of household members has changed. If a change has occurred and there is greater than 90 days prior to the end of a certification, reassess income eligibility.
- If the Responsible adult is new to WIC, create a new family in WISPr and transfer participant(s).
- Ensure contact information is up-to-date.
- Assign a new WIC folder (if feasible destroy previous folder assigned to the participant).
- Review and sign the Rights, Responsibilities and Consent.
- Educate on use of benefits (how to use checks, identify a WIC vendor, food list etc.).

**NOTE:** Staff should never edit the Responsible Adult in WISPr. If there is a new Responsible Adult being assigned to a participant at certification or mid-certification, a new family needs to be created. Staff should always search in WISPr to make sure the Responsible Adult does not already exist before creating a new family.

If benefits have been issued for the current month to the previous Responsible Adult/Authorized signer:

- Designated staff must call the State agency to see if the current month's checks have cleared the bank.

- If checks have been cleared for that month, they cannot be reissued.

If benefits have been issued for multiple months to the previous Responsible Adult/ Authorized signer:

- Designated staff must inform the previous Responsible Adult/Authorized Signer that the program has been informed the infant or child is no longer in their custody and to return unused checks to the clinic. He/she may be required to reimburse Idaho WIC either the dollar amount or quantity and type of items if a check is redeemed. Staff should document this discussion in WISPr.
- Designated staff must void the previous Responsible Adults checks, complete a Check Audit form, and document that checks were reissued.
- The State agency will check bank files for each month of checks that have been replaced to see if both check and its replacement check have cleared the bank.
- If upon further investigation the checks appear to have been redeemed, the State agency will follow up on a case-by-case basis with the local agency Coordinator.

If a scenario occurs that is not covered above, the local agency Coordinator may consult with the State agency on a case-by-case basis to review circumstances.

## REFERENCE

Oregon WIC Policy Manual

## CHANGE IN INCOME

Only one income determination is required in a certification period. Once an applicant is certified as "income eligible" he/she remains so for the duration of the certification period.

If a participant shares a change in income mid-certification and this information is not solicited by staff, an income reassessment must be made. Reassessment of income mid-certification is not required if sufficient time does not exist to effect the change. Sufficient time means 90 days prior to the expiration of the certification period.

Adjunctively-eligible WIC participants (as defined by the policy) may not be disqualified from the WIC Program solely because they, or certain household members, no longer participate in one of the other specified programs. The State agency will ensure that such participants and other household members currently receiving WIC benefits are disqualified during a certification period only after their income eligibility has been reassessed based on the income screening procedures used for applicants who are not adjunctively eligible.

**NOTE:** A participant's certification period is to end on December 15. He/she comes to a WIC appointment on September 1 and states he/she may be over income due to a job change. An income reassessment must be done since it is more than 90 days until the certification ends.

## REFERENCE

7 CFR 246.7(h)(1)(i) *Mandatory Reassessment of Income Eligibility Mid-Certification.* 7 CFR 246.7(h)(1)(ii) *Mandatory Disqualification Mid-Certification for Income Eligibility.*

## **INELIGIBLE AT MID CERTIFICATION**

### **POLICY**

A participant who becomes ineligible at any time during a certification period shall be advised in writing at least 15 days before termination from the program.

### **EXPLANATION**

The agency must explain to the participant why he or she is not eligible.

### **LETTER**

Ask the Responsible Adult to sign a copy of the Letter of Ineligibility and give him/her a copy of the letter. File the letter in case a Fair Hearing is requested or a discrimination complaint is filed.

### **DOCUMENTATION**

A copy of the Letter of Ineligibility, the Application (if applicable), and other certification documentation must be kept on file (electronic or hard copy) for four years. If this is a new applicant, it may be kept in a designated place, such as an Ineligible Applicant file.

### **REFERENCE**

7 CFR 246.7 (g) *Certification Periods.*

7CFR, Sub part C, 246.7 Certification of participants

E-mail from Tricia Barnes (06/29/99)

WRO Policy Memo 803-R: WIC Eligibility of Wet Nurses (issued as All States Memo 93-119, 06/25/93)

All States Memorandum Participation Reporting, WIC Program (11/30/88)

WRO Policy Memo 803-AB: Categorical Eligibility and Postpartum WIC Benefits for Women Whose Pregnancy Terminated (issued as All States Memo 95-148, 09/21/95)

WRO Policy Memo 803-AC: Non-Birth Mothers Certified as Breastfeeding Women (issued as All States Memo 96-06, 10/06/95)

## **SECTION D: HEALTH SCREEN**

### **OVERVIEW**

The health screen is applicable to participants with extended certification periods greater than six (6) months including breastfeeding women, infants and children. During the health screen major changes from the initial certification should be identified such as a new medical diagnosis, changes in eating pattern/food intake/food package and changes in physical activity/health behaviors. Time should also be expended reviewing the last health screening and addressing new concerns raised by the participant.

### **POLICY**

#### **HEALTH SCREENING**

Conduct a health screening by collecting nutrition-related information such as

- Health Assessment
  - Height and weight
  - Blood test (if applicable)
- Assessment interview

#### **CARE PLAN**

Documentation must include a well-developed care plan based on information obtained from the health screening including the following components:

- Intervention and nutrition education provided
- Education materials discussed
- Progress evaluation criteria to determine effectiveness of nutrition education.
- Client goal(s)
- Plan for follow-up

#### **NUTRITION EDUCATION**

A minimum of four (4) nutrition education contacts must be made available during the one year certification period for all adult participants, parents or caretakers of infant and child participants and the child participants themselves, when possible.

#### **REFERRALS**

Based on the participant(s) responses, appropriate referrals must be provided as applicable.

#### **IMMUNIZATION SCREENING**

Follow-up screening for immunization must occur during the health screen for children under the age of two.

#### **REFERENCE**

WRO Policy Memorandum (August 2011) Guidance for Providing Quality WIC Nutrition Services during Extended Certification Periods.

# SECTION E: INELIGIBLE

## OVERVIEW

### IN THIS SECTION

Notice of Certification Ending  
Ineligible at Certification

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## NOTICE OF CERTIFICATION ENDING

### POLICY

Participants shall be advised in writing that the certification is ending at least 15 days before the certification expires. The notice must include information about why the participant is no longer eligible and the right to request a Fair Hearing.

A participant is no longer eligible for the following reasons:

- Moved out of service area
- Over Income
- Voluntary withdrawal
- Deceased
- Disqualified
- Error
- Dual participation in WIC
- Program misuse
- Not serving priority
- Client receiving benefits from CSFP
- Categorically ineligible

### REFERENCE

7CFR 247.7 (j)(8) Notification of Participant Rights and Responsibilities  
7CFR 246.7 (g) Certification Periods

## INELIGIBLE AT CERTIFICATION

### LETTER OF INELIGIBILITY

Ask the Applicant/Responsible Adult to sign a copy of a Letter of Ineligibility and give him/her a copy of the letter. File the letter in case a Fair Hearing is requested or a discrimination complaint is filed.

## **DOCUMENTATION**

A copy of the Letter of Ineligibility, the Application (if applicable), and other certification documentation must be kept on file (electronic or hard copy) for four years. If this is a new applicant, it may be kept in a designated place, such as an Ineligible Applicant file.

## **REFERENCE**

7CFR, Sub part C, 246.7 Certification of participants

E-mail from Tricia Barnes (06/29/99)

WRO Policy Memo 803-R: WIC Eligibility of Wet Nurses (issued as All States Memo 93-119, 06/25/93)

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