

# Section 5.2: Certification Procedures

## Certification Procedures Overview

6/2024

**References:** 7CFR 246.7, 246.12

**Policy:** Staff must follow prescribed procedures during the certification process.

**Purpose:** To accurately assess and enroll all eligible applicants for WIC services.

## Procedures

1. Maintain Separation of Duties in the certification process.
  - One employee cannot determine both income eligibility and medical/nutrition risk in the certification process for the same participant. See [Section 1.18: Separation of Duties to Assure Program Integrity](#).
  - WIC staff shall not complete any part of the certification or issue food benefits to oneself, one's children or grandchildren, relatives, or close friends. See [Section 1.19: Avoid Conflict of Interest to Assure Program Integrity](#).
2. At the certification appointment, the CPA must assess the applicant's eligibility in each of the following areas:
  - Category (Woman, Infant, Child)
  - Minnesota residency
  - Identity
  - Income
  - Health and nutritional risk
3. When the applicant is determined to meet the category, residency, identity and income requirements at certification, the CPA must:
  - Obtain anthropometric measurements and bloodwork as required.
  - Provide a health and nutrition assessment.
  - Provide nutrition education appropriate to the participant's nutritional need and interests.

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- Discuss available food choices with the participant/parent/guardian (PPG) and determine an appropriate food prescription based on nutrition needs and preferences.
  - Provide referrals as appropriate.
  - Sign the signature pad as confirmation that the participant was determined eligible.
4. The CPA or other appropriate staff must:
- Review the Rights & Responsibilities with the participant and obtain a signature from the participant to acknowledge agreement. See Guidance for signature options.
  - Issue food benefits as designated by the CPA.
  - Explain the food benefits and how to shop for WIC foods (see [Section 7.2: Allowed WIC Foods](#)).
  - Assure that participants have the following information, which may be provided as written materials or by demonstrating how to access them through electronic means, such as with the WIC app:
    - [Welcome to WIC Handbook](#)
    - [WIC Shopping Guide](#)
    - List of WIC approved vendors in their area. Refer to the [WIC Grocery Stores](#) search function to identify vendors
    - How to use the MN WIC app
5. A proxy may stand in for the participant/parent/guardian (PPG) at a certification, if the PPG is not able to be present.
- By designating the proxy to represent them and sending the proxy to the WIC clinic in his/her place, the PPG has given implied consent for WIC staff to share information with the proxy as appropriate for the type of appointment or interaction being conducted.
  - The PPG may designate up to two proxies to represent them at the WIC clinic.
  - The proxy must be a competent person, at least 16 years old.
  - See [Section 8.3: Issuing WIC Cards](#) for information about proxies and the WIC Card.
6. All information about the participant is private data. A signed release from the participant, or a court order, is required to release information to anyone other than the parent/ participant/guardian. See [Section 1.7: Data Privacy](#) for more information.

## Guidance – Certification Procedures

One document can be used as proof for multiple areas of eligibility including identity, residency, and income. For example, a current pay stub or Phone/Online Medical Assistance verification could potentially serve as proof of identity, income, and residency if it includes all those areas and is up-to-date.

If staff are unable to collect a participant signature at the certification on the signature pad, use one of the following options to obtain the signature. Scan the form into the Information System:

- Obtain an electronic signature using the [Participant Signature Form](#) or by another electronic signature platform such as DocuSign.
- Use the [Exhibit 5-B: Registers for Manual Signatures](#).

## Manual Certification Forms

Manual Certification forms can be used to record information required to complete a certification when the Information System is unavailable, for example during a power failure or internet outage. Manual Certification forms include:

- [Exhibit 5-II1 Manual Certification – Infants and Children](#)
- [Exhibit 5-II2 Manual Certification - Women](#)
- [Exhibit 5-II3 Manual Certification – Proof of Eligibility](#)

Completed forms include private data and must be secured. Once Information System access is restored, enter the certification information as soon as possible so the participant can access their benefits. Manual Certification forms need to be immediately disposed of in a confidential manner.

- Refer to [Section 1.17: Emergency Actions](#) for considerations during an emergency, such as a prolonged power outage.

## 5.2.1 Category

**References:** 7CFR 246.7 (c)

**Policy:** Each applicant must be in a category that is eligible for WIC participation. Eligible categories are: pregnant women, postpartum women, postpartum breastfeeding women, children less than age five, and infants.

**Purpose:** To ensure that applicants are eligible for the WIC program.

## Procedures

Determine if the applicant is one of the following:

- **A pregnant woman** determined to have one or more embryos or fetuses in utero (proof of pregnancy is not required)
- **A post-partum woman** within 12 months of the end of a pregnancy who is breastfeeding or providing breast milk to her infant an average of once per day or more

- **A postpartum non-breastfeeding woman** within six months of termination of a pregnancy. The end of a pregnancy is the date the pregnancy terminates (i.e., date of delivery, abortion, fetal death, or miscarriage).
- **An infant** under one year of age
- **A child** who has had her/his first birthday but has not yet reached her/his fifth birthday

## Certification Periods

Services are to be provided to participants throughout their certification period as long as they remain income eligible, unless the participant chooses not to continue, or in cases of participant abuse/fraud.

- **Pregnant Women** are categorically eligible through the duration of their pregnancy and up to six (6) weeks postpartum. Following delivery, women may receive one food package before being certified as a postpartum woman. To continue beyond the 6-week postpartum period, the woman must be certified as either a breastfeeding or non-breastfeeding woman.
- **Breastfeeding women** are categorically eligible for **up to one year**, ending with the last day of the month in which her breastfed infant turns one. A postpartum woman who provides breast milk to her infant at least once a day (on average), is considered a “breastfeeding woman.” A mid-certification is required. See [Section 5.10: Mid-Certification](#).
  - Breastfeeding women are either *fully* breastfeeding (her infant is fully breastfed, and receives no formula) or *partially* breastfeeding (her infant is breastfed *and* receives some formula; the woman is categorized as *mostly-* or *some-*breastfeeding depending on how much formula her infant receives from WIC). The **certification periods are the same**, but the WIC food package the woman is eligible to receive depends on how much she is breastfeeding, how much formula her infant is taking, and her infant’s age. See [Chapter 7: Food Package](#).
    - **Some-Breastfeeding after six months postpartum:** women who continue to provide breastmilk at least daily after six months postpartum remain active participants, and can continue receiving nutrition services (including nutrition education and a mid-certification), but they are no longer eligible to receive WIC food benefits. See [Section 7.12](#). The local agency is reimbursed for these services.
  - If a breastfeeding woman becomes pregnant, she should be (re)certified as a *pregnant woman*, and is then eligible through the duration of the pregnancy and up to six (6) weeks postpartum.
  - If a breastfeeding woman reduces her breastfeeding to *less than once a day*, the CPA **must change her category** in the participant record to a *non-breastfeeding postpartum woman* (see below).
    - If her infant is less than 6 months old, she is categorically eligible to receive services as a non-breastfeeding postpartum woman until the last day of the

month in which her infant turns 6 months old. Nutrition risk codes and priority *are not* changed at this time.

- If her infant is 6 months or older, she is given 15 days notification of pending ineligibility. If she is due to receive benefits within the 15 days, CPAs may issue a final month of food benefits. See [Section 5.4: Notification of Ineligibility/Disqualification](#).
- **Non-breastfeeding postpartum women** are categorically eligible for up to 6 months from the end of the pregnancy. This includes a woman who had an abortion, a miscarriage, or a fetal death.
- **Infants under 6 months of age** are categorically eligible until the last day of the month in which they turn 1 year old. A mid-certification is required. See [Section 5.10: Mid-Certification](#).
- **Infants 6 months of age and over** are categorically eligible for a six-month period.
- **Children** are categorically eligible at one year intervals, ending with the last day of the month in which the child reaches the 5<sup>th</sup> birthday. A mid-certification is required. See [Section 5.10: Mid-Certification](#).

**Note:** In situations where there is difficulty scheduling the appointment for a pregnant woman, postpartum breastfeeding woman, infant, and child, the certification period may be shortened or lengthened by a period not to exceed 30 days.

## 5.2.2 Residency

**References:** 7 CFR 246.7, Local Agency Grant Agreement

**Policy:** An applicant must reside in Minnesota to be eligible to receive Minnesota WIC services. Applicants must provide proof of residency (including a physical address) at certification.

- Participants must reside in the state at the time of benefit issuance and during the time for which benefits are intended.
- Participants who are (or intend to be) out of the state, or out of the country, are not eligible to receive Minnesota WIC benefits until they return to Minnesota.
- Benefits may not be given to a proxy for the purpose of mailing food benefits to members of a family who are out of Minnesota.

**Purpose:** To ensure that applicants are eligible to receive WIC benefits in Minnesota, and that eligible applicants are served at whatever local agency or clinic they choose.

## Procedures

### Assessing Residency Eligibility

- At the certification, review documentation of residency (i.e., location or address where the applicant/participant routinely lives or spends the night). Either paper or electronic documentation (such as a proof viewed on the participant's phone), is acceptable. Examples of acceptable proof of residency include:
  - Bill, with the billing address included
  - Driver's license
  - Immunization Record/Registry
  - Mail addressed to applicant
  - Pay stub (paper or electronic)
  - Phone/Online system such as MA
  - Rental or lease agreement, or rent receipt
  - Signed statement verifying residency from a landlord, employer, shelter worker, staff engaged in public or private social services, legal services, law enforcement, or health services.
  - Safe at Home participation card (see information below)
- Even if applicants are known to staff, they must still provide documentation of residency at *the initial certification*. "Known to Staff" may not be used for anyone at the initial certification. Staff should routinely ask, "Did you bring something with your name and address on it, such as a driver's license or paystub?"
- If the information is adequate, document the source in the WIC Information System.
- For infants and children, proof of the parent or guardian's residency may be used.
- **A post office box may not be used as the physical residence** address except for participants enrolled in the *Safe at Home* program. A post office box *may be used for the mailing address*.
- *Safe at Home*: Below are procedures for working with families enrolled in the [Safe at Home](#) program, a statewide Address Confidentiality Service administered by the Office of the Secretary of State for victims of abuse.
  - Minnesota Statutes Chapter 5B and [Minnesota Rules Chapter 8290](#) mandate that all public and private entities must accept a participant's assigned Safe at Home address (PO Box) as their actual address of residence.
  - Use the participant's Safe at Home program participation card to verify enrollment in the program.

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- Use the participant's Safe at Home PO Box address for both the physical residence and mailing addresses. All Safe at Home participants have the same PO Box number, but each will have an individual "lot number" that goes with it.
- Write a brief note in the participant record explaining that the participant is enrolled in Safe at Home.
- Proceed with certification.

### Temporary Eligibility – if documentation is not available

If required documentation for residency is not available at the certification appointment, the CPA should complete the certification process and notify the participant that his/her eligibility is *temporary*, pending receipt of the required documentation within 30 days.

- Finish the certification using "*Pending Proof*" in the drop-down menu for documentation of residency.
- Issue only **one month** of food benefits.
- Explain their options for providing documentation and give them a reminder to:
  - Submit the pending proof electronically (email, text, etc.), or
  - Return the following month (or sooner) with the required documentation for additional benefits.
- Review the pending documentation when received and make a determination of eligibility.
  - Enter the information (i.e., what documentation was provided) into the participant record. Delete/destroy any electronic documents received.
  - Issue food benefits if appropriate, or
  - Initiate ineligibility procedures if documentation is not provided or is not acceptable. See Section 5.4: Notification of Ineligibility/ Disqualification.
- Under no circumstances may a second 30-day temporary eligibility period be allowed.

### Waiver - limited situations when a waiver may be used for lack of residency documentation

In limited circumstances, staff may determine that the applicant is in a situation in which written documents are not available. Examples include:

- Fire
- Theft
- Disaster
- Migrant farmworker families

(Individuals whose principal employment is in agriculture on a seasonal basis and who establish, for the purposes of such employment, a temporary abode.)

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- Homeless individual or family
  - Landlord who refuses to provide a written statement documenting residency
1. Complete the certification using “*Waiver Signed*” in the drop down menu for the documentation of residency.
  2. Generate and complete the appropriate form from the Information system, obtain signature, and import/scan the document into the Information System for all applicable household members.
  3. Assess the individual situation and issue the appropriate set(s) of benefits that best meets the needs of the applicant.

### Guidance-Residency

- While most applicants/participants will request services from a local WIC provider in their county of residence, some may prefer to receive services from a WIC provider in another service area (e.g., the county in which they work).
  - For these requests, explore whether the participant is aware of services available in the area in which they reside or work, in case that option might work better for them.
  - Assist participants to find a WIC agency/clinic that best meets their needs.
- Personal knowledge of the participant’s residence by WIC staff at subsequent certifications may be allowed once initial proof of residency has been established.
- If residency has been documented for one family member within the last 3 months, it can be used for other family members being certified within that 3-month period.
- Staff should assist applicants by suggesting ways to meet the residency requirement, such as bringing in an envelope mailed to them at their current address.
- One document can be used as proof for multiple areas of eligibility including identity, residency, and income. For example, a current pay stub or Phone/Online Medical Assistance verification could potentially serve as proof of identity, income, and residency if it includes all those areas and is up to date.
- Applicants do not need to be U.S. citizens to receive WIC services.
- Contact your State Consultant with any questions or concerns regarding residency.

### 5.2.3 Identity

**References:** 7CFR 246.7 (c)(2)(i)

**Policy:** Applicants must provide proof of identity at each certification. If the applicant is an infant or child, proof of identity for the parent, foster parent, or guardian is also required.



**Purpose:** To establish the identity of the applicant.

## Procedures

### Certification with Proof of Identity

1. Verify proof of identity for the applicant/participant. Paper or electronic documentation of identity, such as that displayed on a phone, is adequate. Examples of acceptable forms of proof of identity include:

- Baptismal certificate
- Birth certificate
- Driver's license
- Health benefits (insurance) card
- Hospital crib card - *for infant only*
- Immunization record
- Passport
- Pay stub
- Phone/Online system such as MA
- Photo ID: Acceptable forms include, but are not limited to, photo ID issued by governments (including tribal governments and governments of other countries), employers, and schools.
- Social Security card
- Social services benefit card
- Valid Verification of Certification (VOC) - *for infant or child only*
- Voter Registration card

**Additional forms of *participant identification* acceptable at re-certifications, once initial proof of identification has been documented, include:**

- Known to staff
  - WIC Card
2. Document the source of identification verified in the participant record.
3. Proceed with the certification.

Identity of the Authorized Representative (e.g., parent/guardian) or proxy must be verified during an infant or child certification prior to issuing a WIC card and/or food benefits. See Guidance below.

Refer to Exhibit 5-C: [Identification Requirements by WIC Contact Type](#) for acceptable forms of parent/guardian or proxy identification.

## Certification without Proof of Identity

### Temporary Eligibility – pending proof

If documentation of the applicant/participant identity is not available at the certification appointment, the CPA should complete the certification process and notify the participant that their eligibility is *temporary, pending receipt of the required documentation within 30 days*.

1. Finish the certification; select “Pending Proof” in the Proof of Identification drop-down menu.
2. Issue only one month of food benefits.
3. Explain how the participant may provide the required documentation; remind them to:
  - Submit the pending proof via secure electronic platform, or
  - Return within a month with the required documentation for additional benefits.
4. Review the pending documentation when received and determine eligibility.
5. Enter the source of documentation provided into the participant record. Then delete/destroy any electronic documents received.
6. Issue food benefits if appropriate, or initiate ineligibility procedures if documentation will not be provided. See [Section 5.4: Notification of Ineligibility/Disqualification](#).

Under no circumstances may a second 30-day temporary eligibility period be allowed.

### Waiver - limited situations when a waiver may be used for lack of identity documentation

- In limited circumstances, staff may determine that the applicant is in a situation in which written documents are not available. Examples might include:
    - Fire
    - Theft
    - Disaster
    - Migrant farmworker families  
(Individuals whose principal employment is in agriculture on a seasonal basis and who establish, for the purposes of such employment, a temporary abode.)
    - Homeless individual or family
    - Applicant whose spouse or partner refuses to provide identity documentation (such as a birth certificate for a child)
1. Complete the certification using “Waiver Signed” in the Proof of Identification drop-down menu.

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2. Generate and complete the appropriate form from the Information system, obtain signature, and import/scan the document into the Information System for all applicable household members.
3. Assess the individual situation and issue the appropriate set(s) of food benefits that best meets the needs of the applicant.

### Guidance - Identity

- Verify the identity of the Authorized Representative (i.e., parent/guardian) or proxy at the beginning of the appointment to ensure their authorization to obtain WIC services on behalf of an infant or child.
- If the parent/guardian or proxy lacks proof of identification:
  - For initial certification: Document *pending proof of parent/guardian identification* in an alert and/or note; then follow procedural steps 2-6 outlined in “Certification without Proof of Identity” for *Temporary Eligibility – Pending Proof*.
  - For re-certification: Verify the identity verbally by following these steps:
    1. Confirm the person’s identity by cross-referencing their name with that of an adult participant, authorized representative, or proxy listed in the participant record, and
    2. Request validation of at least two of the following details:
      - The Primary Card Holder’s (PCH’s) date-of-birth,
      - The zip code of the household’s mailing address, and/or
      - The names of household members participating in WIC.
- Staff should assist applicants by suggesting ways to meet the identity requirement.
- For applicants known to staff, documentation of identity is still required at the initial certification. Staff should routinely ask, “Did you bring something with your name and address on it, such as a driver’s license or paystub?”
- Applicants do not need to be US citizens to receive WIC services and food benefits.
- One document can be used as proof for multiple areas of eligibility including identity, residency, and income. For example, a current pay stub or Phone/Online Medical Assistance verification could potentially serve as proof of identity, income and residency if it includes all those areas and is up-to-date.
- Contact your State Consultant with any questions or concerns regarding residency.

### 5.2.4 Income

**References:** 7CFR 246.7 (d)

**Policy:** Each applicant must provide proof of income eligibility for WIC, either through an automatic/adjunctive program or with documentation of household income at each certification.

**Purpose:** To establish income eligibility of the applicant.

## **Definition: Household**

For WIC purposes, “household” is defined as a group of related or non-related individuals who usually (although not necessarily) live together as an economic unit and who share income and the consumption of goods and services.

### **Other examples:**

- A **pregnant woman** should be counted as two or more, taking into account the number of unborn fetuses.
- **Children with parent(s) on active military duty:** children of a military family who are in temporary care can be certified in the following ways:
  - Count the absent parent(s) and their children as the economic unit, as would have been the case prior to the parental deployment.
  - Count the children as a separate economic unit from their parents and caretakers. To be considered a separate economic unit, the unit must have its own source of income. The CPA must decide whether the income is adequate to sustain the economic unit. If the child allotments are not considered adequate, then another certification option can be used.
  - Consider the children to be part of the economic unit of the person(s) with whom they are residing.
- **Split or joint custody:** When the custody of the child is split, the child shall be considered a member of the household in which they live the majority of the time. If the parents share custody 50/50, the child can only qualify for WIC in one parent’s household.
  - Parents can be encouraged to share the food and list the other parent as an alternate representative.
  - If custody papers are available, staff should consider custody arrangements when issuing food benefits.
- If an adult in the household is making **child support** payments for a child not living in this household and who is not receiving WIC food benefits in another household, this child may be counted as a member of the household. Child support payments do not reduce family income.
- A **foster child**, who is living with a family but remains the legal responsibility of a social service or other agency, should be considered a family of one. These children are usually eligible for Medicaid (MA). If siblings enter the same foster care home, the number of

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siblings can be considered the household size and one household ID number assigned to them.

For certain situations where several individuals or families are living together, additional questions may be needed to determine whether the participant is in a separate household.

### Questions to Ask to Determine Separate Household

Question	Household Size
Does the household provide free food, clothing, shelter, etc. with no expectation of payment or in-kind donation such as foods. *	if <b>Yes</b> → applicant is not counted as a separate household – include in the household size if <b>No</b> → count as a separate household
Does the applicant pay the household for living in their home?	if <b>Yes</b> → count as a separate household if <b>No</b> → include in the household size
Does the applicant exchange work, (e.g., household chores, babysitting) for the ability to live in the home?	if <b>Yes</b> → count as a separate household
Does the applicant share income and expenses with other people in the household?	if <b>Yes</b> → include in the household size if <b>No</b> → count as a separate household
Can the applicant provide current eligibility of Minnesota Health Care Programs, SNAP benefits, or MFIP?	if <b>Yes</b> → count as a separate household

\*If a separate household, WIC foods *may not be shared* with another household as payment for or contribution towards household expenses.

### Procedures

Applicants are determined to be income eligible in one of these ways:

- **Automatic/Adjunctive** eligibility based on being currently enrolled in another specific program with comparable income guidelines or being a member of a household in which a family member is currently enrolled in an adjunctive/automatic program.
- **Traditional Income** Determination based on household size and income.

### Automatic/Adjunctive Eligibility

If anyone in the household is currently certified eligible for an adjunctive or automatic eligibility program, members of the household are WIC-eligible. Adjunctive/automatic eligibility programs are:

## Eligibility at Household Level

Medicaid/Medical Assistance (MA)

Minnesota Care

Minnesota Family Investment Program (MFIP)

Supplemental Nutrition Assistance Program (SNAP, previously Food Stamps)

Free/Reduced Price School Lunch

Head Start

Fuel Assistance

## Eligibility at Individual Level

Supplemental Security Income (SSI) or Tax Equity Fiscal Responsibility Act (TEFRA)

- **Household/ family members of the SSI or TEFRA-eligible applicant are not adjunctively eligible for WIC.**

## At certification

- Staff must verify current income eligibility using one of the following:
  - *Notice of Eligibility Letter* from the adjunct program
  - Other written documentation of eligibility from the appropriate agency
  - On-line or telephone access to adjunct programs that verify current enrollment
  - Direct contact with the appropriate agency
- Note: A *Minnesota Health Services Card* alone is not adequate unless staff have verified current enrollment in MA.
- Either paper or electronic documentation (such as proof viewed on the participant's phone) is acceptable.
- Self-reporting of income is not adequate.
- When current eligibility is determined, document this information in the participant record and proceed with the certification.

## Temporary Eligibility - Pending Proof

If proof of adjunctive eligibility cannot be verified at the certification and screening determines the participant is adjunctively-income eligible, he/she is temporarily eligible for **30 days**.

- Select the adjunctive program and the "Pending Proof" dropdown option in the Income screen to indicate this.
- Finish the certification and issue only **one month** of food benefits.
- Explain how the participant may provide that documentation and give a reminder to:

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- Submit the pending proof electronically (email, text, etc.), or
- Return by the following month with the required documentation for additional benefits.
- Review the pending documentation when received and make a determination of eligibility.
  - Enter the information (e.g., what documentation was provided) into the participant record. Then delete/destroy any electronic documents received.
  - Issue food benefits if appropriate, or initiate ineligibility procedures if documentation will not be provided. See [Section 5.4: Notification of Ineligibility/Disqualification](#)
  - Document Separation of Duties at both the initial certification and again when the participant provides proof of income. See [Section 1.18: Separation of Duties to Assure Program Integrity](#)
- Under no circumstances may a second 30-day temporary eligibility period be allowed.

### Traditional Income Determination

If the applicant is not eligible under an adjunct program, determine household size and proceed with eligibility determination based on traditional income guidelines.

### Income Determination

- Income means gross cash income before deductions. If the applicant is self-employed or farms, use the **Total Income** line from the most recent federal income tax return to verify income.
- Local agencies are encouraged to define current income as all income received by the household during the 30 days prior to the date of the WIC application. However, there are situations where a household's current income is more accurately determined by including income in the past 12 months or income anticipated in the next 30 days. Examples of these situations include, but are not limited to:
  - If the household has a recent decrease in income (e.g., the sole support of the family has just been laid off) WIC staff can use prospective income (current income that will be available to the household in the next 30 days).
  - Annual income may be more appropriate to reflect a household's financial circumstances for:
    - Self-employed individuals, including farm income
    - A household where a family member who is on maternity leave will return to her job
    - Teachers who are on a temporary leave for the summer
    - College students who work only during the summer months and school breaks
    - Household member with frequent overtime pay
    - Seasonally employed workers whose income fluctuates

### **Income sources include but are not limited to the following**

- Monetary compensation for services, such as wages, salary, commissions, or fees
- Net income from farm or self-employment (use the **Total Income line** on the most recent tax return)
- Social Security benefits
- Dividends or interest on savings or bonds, income from estates, or net rental income
- Public assistance or welfare payments
- Unemployment compensation
- Government civilian employee, or military retirement or pensions, or veteran's payments
- Private pensions or annuities
- Alimony or child support payments
- Regular contributions from persons not living in the household
- Net royalties
- Other cash income. This includes, but is not limited to:
  - Cash amounts received or withdrawn from any source, including savings
  - Investments
  - Insurance premiums/benefits
  - Bonds
  - Tribal per capita income from casino profits
  - Trust accounts
  - Other resources that are readily available to the family
  - Student financial assistance, such as grants and scholarships, **except** those from programs funded under Title IV of the Higher Education Act of 1965. See next section for those exclusions.

### **Income does not include the following**

- **Student loans and grants** funded by programs funded in whole or part under Title IV of the Higher Education Act of 1965 and used for tuition, student fees, the costs for rental or purchase of any required equipment, materials, supplies, books, transportation, and miscellaneous personal expenses for a student. The following is a list of these exclusions:
  - Pell Grant
  - Supplemental Educational Opportunity Grant
  - State Student Incentive Grant (SEOG)
  - PLUS



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- College Work Study
- Byrd Honor Scholarships
- National Direct Student Loans
- Payments under the Carl D. Perkins Vocational Education Act as amended by the Carl D. Perkins Vocational and Applied Technology Act Amendments of 1990
- **Loans**, either from a bank or from a personal resource (friend, church, etc.), since these funds are only temporarily available and must be repaid.
- Mandatory salary reduction amount for military service personnel to fund the Veteran's Educational Assistance Act of 1984 (GI Bill)
- **Military Pay (certain types of income as listed below)**
  - Basic allowance for housing (BAH) received by military services personnel residing off military installations or in privatized housing, whether on- or off-base.
  - Cost-of-living allowance provided to a member of uniformed services who is on duty outside the contiguous states of the United States (OCONUS COLA).
  - Payments made to members of the armed forces and their families for Family Subsistence Supplemental Allowance (FSSA), if the inclusion of this amount makes the family ineligible for WIC.
  - Combat pay and hostile fire pay for household members who are on active military duty; detail may be found in the *Entitlements* column of the military *Leave and Earning Statement (LES)*.
  - Payments pursuant to Agent Orange Compensation Exclusion Act.
  - Funds received from Filipino Veteran Equity Compensation Fund.
  - The value of in-kind housing or other in-kind benefits. An **in-kind benefit** is anything of value that is not provided in the form of cash.
  - Loans, except amounts to which the applicant has constant or unlimited access.
- **Any child care payments from the following programs:**
  - At-Risk Child Care Programs
  - Child Care Development Block Grant
  - Any Program under Section 402 of the Social Security Act
- **The value of assistance to children or their families from the following programs:**
  - School Lunch Program
  - Farmer's Market Nutrition Program
  - Supplemental Nutrition Assistance Program – SNAP (previously Food Stamps)

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- **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.
- 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 Farm-workers Program
  - Veterans Employment Program
  - Job Corps
- Payments under the **Low Income Energy Assistance Act**, as amended.
- Any payment to volunteers under Title 1 (VISTA and others) and Title 11 (RSVP, foster grandparents, and others) of the **Domestic Volunteer Service Act** of 1973.
- Payment to volunteers under Section 8 (b)(1)(B) of the **Small Business Act** (SCORE and ACE).
- Payments under the **Disaster Relief Act** of 1974, as amended by the Disaster Relief and Emergency Assistance Amendments of 1989.
- Payments received for **Wartime Relocation of Civilians** under the Civil Liberties Act of 1988.
- Reimbursements from the **Uniform Relocation Assistance and Real Property Acquisition Policies Act** of 1970.
- Payments received under the **Old Age Assistance Claims Settlement Act**, except for per capita shares in excess of \$2000.
- Payments received under the **Judgment Award Authorization Act**, as amended.
- Payments received under the **Cranston-Gonzales National Affordable Housing Act**, unless the income of the family equals 80 percent of the median income of the area.
- Payments received under the **Housing and Community Development Act** of 1987, unless the income of the family increases at any time to not less than 50 percent of the median income of the area.
- Payments received under the **Alaska Native Claims Settlement Act**.
- Federal compensation to the following **Native American groups**:
  - Chippewa in Mississippi, in Michigan, the Red Lake Band of Chippewa (Minnesota), and the Turtle Mountain Band of Chippewa (Arizona)
  - Blackfeet, Grosventre, and Assiniboine tribes (Montana)
  - Papago (Arizona)
  - Grand River Band of Ottawa Indians

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- Yakima Indian Nation (Indian Claims Commission payments)
- Apache Tribe of the Mescalero Reservation (Indian Claims Commission payments)
- Navaho and Hopi Tribe (relocation assistance)
- Saginaw Chippewa (Saginaw Indian Tribe of Michigan Distribution of Judgement payments)
- Sac and Fox tribe (claims agreement payments)
- Passamaquoddy Tribe and Penobscot Nation (Maine Indian Claims Settlement Act of 1980 payments)
- Income from submarginal U.S. land held in trust for certain Indian tribes
- **Tribal per capita income not from casino profits:** If an enrolled member's per capita payment is not from casino profits and meets the income exclusions per 7 CFR 246.7(d)(2)(iv), then the income can be excluded.
- **Disability** insurance payments, disability court settlements, and one-time disability payments.

### Documentation of Income

1. At the certification, determine household size, and use the *Income Eligibility* screen in the WIC Information System to calculate total income. The applicant must provide documentation of income. Acceptable forms of proof of income include:
  - Alimony
  - Child support payments/letter
  - Military pay documentation
  - Pay stub
  - Social Security/SSI documentation
  - Tax return
  - Unemployment documents
  - W-2 forms
  - Written statement from the employer
2. If the information is adequate, and the applicant meets income guidelines, document sources and amount of income in the participant record.
3. Proceed with the certification.

### Temporary Eligibility - Pending Proof

- **Reported income does not exceed 185% Federal Poverty Guidelines (FPG)**

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If proof of income eligibility cannot be verified at the certification and screening determines the participant's income does not exceed 185% FPG, (refer to [Exhibit 5-A: Minnesota WIC Income Eligibility Guidelines](#)) they are temporarily eligible for **30 days**.

- Enter the income as reported by the participant and select the “Pending Proof of Income” checkbox.
- Finish the certification and issue only **one month** of food benefits.
- Explain how the participant may provide that documentation and give a reminder to:
  - Submit the pending proof electronically (email, text, etc.), or
  - Return by the following month with the required documentation for additional benefits.
- Review the pending documentation when received and make a determination of eligibility.
  - Enter the income and what documentation was provided into the participant record. Delete/destroy any electronic documents received.
  - Issue food benefits if appropriate, or initiate ineligibility procedures if documentation will not be provided. See [Section 5.4: Notification of Ineligibility/ Disqualification](#).
- Document Separation of Duties at both the initial certification and again when the participant provides proof of income. See [Section 1.18: Separation of Duties to Assure Program Integrity](#).
- **If the applicant fails to provide the required documentation:** do not issue benefits until the participant provides the required documentation. Under no circumstances may a second 30-day temporary eligibility period be allowed.

Temporary eligibility does not apply to applicants whose income is above traditional income guidelines, but is within the Minnesota Health Care Program (MHCP) guidelines. See Presumptive Eligibility.

### Presumptive Eligibility

- Applicants may be presumptively eligible for WIC if their household income **is greater than 185%**, but within the income guidelines for the Minnesota Health Care Program (MHCP) (see [Exhibit 5-A: Minnesota WIC Eligibility Guidelines](#)). Staff must see income documentation in order to determine that the applicant is presumptively eligible (PE). **Self-reported income is not adequate**. After verifying income documentation, staff may issue up to 3 months of food benefits pending the determination of eligibility for MHCP.
- Inform the applicant that they must agree to apply for Minnesota Health Care Programs as soon as possible.
- Write an alert and a “Presumptive Eligibility (PE)” note. Include family size, the income, and type of income proof provided in the note.
- Determine current status of the MHCP application at the next visit and document status in the participant income record.
  - Write a “PE Update” note about how the presumptive eligibility was resolved.

## SECTION 5.2: CERTIFICATION PROCEDURES

- If verification can be determined that the MHCP application is still pending, an additional 3 months of food benefits may be issued.
- This extension may be provided on a case-by-case basis, but may never be extended beyond the second 3-month period.
- Document Separation of Duties at both the initial certification appointment and again when the participant provides documentation of MHCP enrollment. See [Section 1.18: Separation of Duties to Assure Program Integrity](#).
- Initiate ineligibility procedures if documentation will not be provided. See [Section 5.4: Notification of Ineligibility/Disqualification](#).

### **Applicants Reporting Zero Income - Traditional Income Eligibility**

- For applicants declaring a zero income:
  - Ask probing questions about how they obtain basic living necessities such as food, shelter, medical care, and clothing in a non-judgmental manner. Document the explanation for the zero income situation in a Note, using the *“Income Information”* subject heading.
  - Choose “Self Declaration” for the Proof of Income in the WIC Information System. “Self Declaration” is the only proof option that will accept a zero income amount. This proof option cannot be used for any other situation.
  - Provide referrals and assistance to the family and document the information in the participant record. Examples of questions to ask are:
    - Do you need assistance in finding a place to live, or food for your family?
    - What challenges do you have finding shelter or food?

### **Waiver - limited situations when a waiver may be used for lack of income documentation**

In limited circumstances, staff may determine that the applicant is in a situation in which written documents are not available. Examples might include:

- Fire
  - Theft
  - Disaster
  - Migrant farmworker families  
(Individuals whose principal employment is in agriculture on a seasonal basis and who establish, for the purposes of such employment, a temporary abode.)
  - Homeless individual or family
  - Applicant whose spouse or partner refuses to provide documentation
1. Complete the certification using “Waiver Signed” in the drop down menu for the documentation of income.

## SECTION 5.2: CERTIFICATION PROCEDURES

2. Print the Certification Notice. Have the participant/parent/guardian sign and indicate what information they are unable to provide. Scan this form into the participant record.
3. Assess the individual situation and issue the appropriate set(s) of benefits that best meets the needs of the applicant.

### Reassessment of Income Eligibility During the Certification

Participants are not required to report income changes during the certification period nor are local agency staff required to inquire about changes. However, if both the following conditions are met for an active participant, local agency staff must reassess income eligibility:

- Staff receives credible information indicating a change in the participant's income or a change in family size that would result in that person/family no longer qualifying for WIC services.
- It is more than 90 days until the end of the certification period.

If both of these conditions are met, then staff should reassess income eligibility, including screening for adjunctive eligibility and/or traditional income eligibility. Explore all other options for participation in programs that may grant adjunctive eligibility for WIC.

- Participants found to no longer be eligible, must be disqualified and informed of their ineligibility. This must be done at least 15 days before the date of termination. Staff may issue a partial food package to the date of the termination. [Section 5.4: Notification of Ineligibility/Disqualification](#).
- Participation of other active household members will be terminated if it is determined that another member of the household is no longer income-eligible for the WIC program. Staff may issue a partial food package to the date of the termination.
- If staff determine that a participant and other active household members who are becoming ineligible should be issued food benefits, this must be done before initiating ineligibility procedures in the WIC Information System.
- Staff must enter new information (such as new income or change in family size). A '*Notice of Ineligibility*' will be generated by the system and must be given to the participant.

Staff must document in a note the reason for reassessment and termination in the record.

### Migrants

Income eligibility for in-stream migrant farmworkers must be documented only once in 12 months. The date of the last income determination is available in the WIC Information System.

*Migrant farmworker* means an 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 purposes of such employment, a temporary abode.

## Guidance - Income

- If income has been documented for one family member within the last 3 months, it can be used for other family members being certified within that 3-month period.
- Staff should assist applicants by suggesting ways to meet the proof of income requirement.
- Applicants do not need to be a U.S. citizen to receive WIC services and food benefits.
- One document can be used as proof for multiple areas of eligibility including identity, residency, and income. For example, a current pay stub or Phone/Online Medical Assistance verification could potentially serve as proof of identity, income and residency if it includes all those areas and is up-to-date.
- Contact your State Consultant with any questions or concerns regarding income.

## 5.2.5: Physical Presence

**References:** 7CFR 246.7 (o)

**Policy:** Applicants must be physically present for the initial and subsequent certifications, except in certain limited circumstances. Local agencies should accommodate applicants/participants who are unable to come to clinic for services for health reasons (see exceptions below).

**Purpose:** To maximize benefits to participant families through full and active participation in WIC.

## Procedures

- Physical presence must be documented. Staff must check the box “Physically Present” in the participant record.
- The physical presence requirement may be met when a certification is completed at a site other than the regular WIC clinic (e.g., the participant’s home, health care clinic, etc.).

## Allowable exceptions to physical presence

**Illness:** If an applicant is too ill to come to clinic, his/her existence may be verified by another health professional/agency.

**Individual with disabilities:** If an applicant or parent/guardian has a disability and is unable to be physically present at clinic because of his/her disability, the individual may be certified without being physically present. His/her existence may be verified by another health professional/agency. Examples include:

## SECTION 5.2: CERTIFICATION PROCEDURES

- A medical condition that necessitates the use of medical equipment that is not easily transportable
- A medical condition that requires confinement to bed
- A serious illness that may be made worse by coming to the clinic

No persons with disabilities are automatically exempt from the requirement to be physically present, nor does an exemption for the initial certification automatically exempt them from being physically present for the subsequent certifications.

- If the participant applies for re-certification, the circumstances of exception *must be reassessed*.
- In the case of long-term or permanent disability or medical condition, an extended exemption to the physical presence requirement may be allowed.

**Receiving ongoing health care:** An infant or child who has documented ongoing health care from a provider other than WIC would not have to be physically present for a re-certification if being physically present would pose an unreasonable barrier to participation. Ongoing health care means that the child is receiving well-child care following the American Academy of Pediatrics ([AAP Schedule of Well-Child Care Visits](#)) for screenings and assessments. Verbal confirmation is acceptable.

**Working parents or caretakers:** WIC staff should work with parents and caretakers to arrange an appointment that will work for the family, whenever possible. However, a child under the care of a working parent whose work condition poses a barrier to bringing the child to clinic, would not have to be physically present for a re-certification if he/she were present at the initial certification and had been present at a WIC contact, at a minimum, once during the prior year. Note: High risk follow-up may necessitate being seen more often than once annually. See [Section 6.6: High Risk Individual Nutrition Care Plans](#).

### If the applicant is not physically present

- Proof of identity, income, and residency is still required.
- A reason for the exception to being physically present must be documented in the participant record.
- Referral data may be used for height/length, weight, and/or hemoglobin. This information could be obtained during a home visit or from another health professional/agency, if measurements meet the timing requirements specified in [Sections 5.3.2.2](#) (for hematologic date) and [5.3.1.1](#) (for height/length and weight).

### Guidance- Physical Presence

- Participants will receive the greatest benefit from WIC through full and active participation.
- Agencies should schedule clinic hours to accommodate families whenever possible.
- In the event of a participant's illness, it may be preferable to reschedule the participant's appointment.



- When a participant is certified at a site other than the WIC clinic, document the location of the certification in Notes.
- Contact your State Consultant with any questions or concerns regarding residency.

## Reference – Complete Listing of Hyperlinks

### 5.2 Certification Procedures

Section 1.18: Separation of Duties to Assure Program Integrity

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1\\_18.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_18.pdf))

Section 1.19: Avoid Conflict of Interest to Assure Program Integrity

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1\\_19.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_19.pdf))

Rights & Responsibilities (<https://www.health.state.mn.us/people/wic/rights.html>)

Section 7.2: Allowed WIC Foods

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7\\_2.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7_2.pdf))

Welcome to WIC Handbook

(<https://www.health.state.mn.us/docs/people/wic/ewic/welcometowic.pdf>)

WIC Shopping Guide

(<http://www.health.state.mn.us/docs/people/wic/vendor/fpchng/shopguide.pdf>)

WIC Grocery Stores (<https://www.health.state.mn.us/people/wic/stores.html>)

Section 8.3: Issuing WIC Cards

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch8/sctn8\\_3.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch8/sctn8_3.pdf))

Section 1.7: Data Privacy

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1\\_7.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_7.pdf))

Participant Signature Form (<https://redcap.health.state.mn.us/redcap/surveys/?s=TD4P4PEJPT>)

5-B Registers for Manual Signatures (WORD)

([www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5b.docx](http://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5b.docx))

Exhibit 5-II1 Manual Certification – Infants and Children

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5ii1.pdf>)

Exhibit 5-II2 Manual Certification - Women

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5ii2.pdf>)

## SECTION 5.2: CERTIFICATION PROCEDURES

### Exhibit 5-II3 Manual Certification – Proof of Eligibility

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5ii3.pdf>)

### Section 1.17: Emergency Actions

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1\\_17.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_17.pdf))

## 5.2.1 Category

### Section 5.10: Midcertification

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_10.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_10.pdf))

### Chapter 7: Food Package

(<https://www.health.state.mn.us/people/wic/localagency/mom.html#foodpackage>)

### Section 7.12: Food Package 6 Some-Breastfeeding and Nonbreastfeeding Postpartum Women

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7\\_12.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7_12.pdf))

### Section 5.4: Notification of Ineligibility/Disqualification

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_4.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_4.pdf))

## 5.2.2 Residency

Safe at Home (<http://www.sos.state.mn.us/safe-at-home/>)

Minnesota Rules Chapter 8290 (<https://www.revisor.mn.gov/rules/8290/>)

### Section 5.4: Notification of Ineligibility/Disqualification

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_4.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_4.pdf))

## 5.2.3 Identity

### Section 5.4: Notification of Ineligibility/Disqualification

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_4.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_4.pdf))

### Exhibit 5-C: Identification Requirements by WIC Contact Type

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5c.pdf>)

## 5.2.4 Income

### Section 5.4: Notification of Ineligibility/Disqualification

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_4.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_4.pdf))

## SECTION 5.2: CERTIFICATION PROCEDURES

### Section 1.18: Separation of Duties to Assure Program Integrity

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1\\_18.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch1/sctn1_18.pdf))

### Exhibit 5-A: Minnesota WIC Income Eligibility Guidelines

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex5/5a.pdf>)

## **5.2.5 Physical Presence**

Schedule of Well-Child Care Visits (<https://www.healthychildren.org/English/family-life/health-management/Pages/Well-Child-Care-A-Check-Up-for-Success.aspx>)

### Section 6.6: High Risk Individual Nutrition Care Plans

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch6/sctn6\\_6.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch6/sctn6_6.pdf))

### Sections 5.3.2.2: Hemotologic Assessment

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_3\\_2.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_3_2.pdf))

### Section 5.3.1.1: Antropmetric Data

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_3\\_1.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_3_1.pdf))

SECTION 5.2: CERTIFICATION PROCEDURES

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