

Module Two: Certification

Part 1: Confidentiality

At all times, participant confidentiality is a primary concern. As with any healthcare environment, confidentiality must be protected at all times. In the clinic, this includes not allowing others to glean information from conversations, as well as keeping computer screens and paper information protected from wandering eyes. All clinic staff should make their best attempt at protecting the participant during discussions by providing a private area to conduct business.

There are times others will seek to gain access to information for which they do not have permission. Information seekers could be law enforcement, caseworkers, estranged spouses, boyfriends, friends, and family members, as well as related or non-related persons to the participant.

In accordance with the State of Indiana WIC Policy, access to WIC participant records is limited to:

1. Persons directly related to the administration or enforcement of the WIC program, including those investigating violations of the WIC program under federal, state or local authority. Those who do not have on-going involvement in the operations or management of the program, such as extraneous staff (administrators who do not directly supervise staff) are not entitled to the participant records.
2. Organizations that have an agreement or memorandum of understanding (MOU) with the State of Indiana WIC program. Indiana WIC currently has MOU's with: Head Start, Early Head Start, Healthy Families and Indiana Mothers' Milk Bank, Inc (IMMBI). All agencies have a copy of the MOU for each organization. Never disclose information without first confirming the MOU or agreement and its limitations.

The MOU limits the type of information released. This permits other agencies to contact the participants regarding services they provide. Participants must also sign the "Release of Information" statement at the bottom of the Income Application before their information is released.

3. The Comptroller General of the United States and his authorities have authorized access when auditing the WIC program.

Confidentiality statements are required to be signed by each WIC staff member, volunteers and students. They are to be kept on file for audit and review.

A sample confidentiality statement has been placed in Appendix A at the end of this document.

Part 2: Certification Basics

The WIC Program calls the enrollment process a “**certification**”. A person who is eligible for WIC will be “**certified**” as a WIC participant.

How do you know if a person qualifies for the WIC Program?

The applicants must:

1. Be in a priority group served by WIC.
2. Provide proof of residency (Indiana).
3. Provide proof of income and meet guidelines.
4. Provide proof of identity.
5. Have a medical/nutritional need.

The applicant is screened for items 1-4 above. If met, a nutritional assessment is completed by a CPA to include height and weight measurements, hemoglobin testing as well as diet and health history. The CPA prioritizes the nutritional/medical concerns, identifies the risk factors and provides nutritional counseling. An appropriate food package is determined and care plan established. The CPA provides documentation of the certification. Upon completion of the certification, the participant will receive WIC checks with the assigned food package as well an appointment for a second nutrition education contact.

What if they are not eligible?

- Some applicants may not meet all the criteria when they come in for certification. Participants will be found ineligible for WIC benefits if they:
 1. Do not meet categorical requirements;
 2. Do not live in Indiana;
 3. Do not bring in proof of income, residency or identity;
 4. Have a household income that exceeds standards;

5. Are a minor who failed to bring parent, guardian, caretaker or adult designee with documentation of consent or proof of legal emancipation;
 6. Do not have a nutrition risk;
 7. Are in a priority group that Indiana is not serving.
- You must give applicants a signed and dated copy of the **Form Letter A “Ineligibility or Termination Form”** (found in Appendix A at the end of this document) that lists why they are not eligible for WIC and information on their right to a Fair Hearing. Participants have the right to appeal the decision of ineligibility.
 - A copy of Letter A and the WIC Signature Page for Certification is placed in the Ineligible-Terminated file for all ineligible applicants.
 - If the applicant's income or health changes, they may reapply at any time.

Part 3: How Is A Certification Appointment Scheduled?

When an applicant contacts a WIC office, the processing time frame begins at that first call or visit to the clinic to apply for Program benefits. All **certification appointments must be prescreened; scheduled for an appointment; processed; and notified of their eligibility/ineligibility** within **10 to 20 days** of their first clinic contact. The following conditions apply:

- **Certification appointments and determination of eligibility** must be made within **10 business days** if the applicant has a **Special Nutrition Risk**. Special Nutrition Risk applicants = prenatal, infant and applicants who meet the federal criteria for being migrant farm workers.
- Certification appointments must be made within **20 days** for all other applicants.
- NEW APPLICANTS ONLY (This does not pertain to a Recertification)

After receiving an initial request for benefits, what must the WIC staff do over the phone to set up an appointment and begin the certification process?

- Prescreen the applicant: Obtain the applicant's name, date of birth, address, phone number, gender, and WIC category.
- Offer a choice of appointment days and times, whenever possible.
- Make sure the applicant agrees to the appointment date and time. This will increase the chances that the applicant will show up.
- Provide information on whom and what to bring with them. (see below)
- Ask the applicant if there are questions or concerns.

The processing time frame is considered met for applicants scheduled and prescreened who have issues arise that prevent them from keeping/completing their appointment, (i.e. no proof of income, fails to make appointment and requests another, etc.) All efforts should be made to ensure the Special Nutrition Risk applicants are seen as soon as possible.

Other Scheduling Considerations

Appointments must be evenly distributed over the hours of clinic operation. The first certification appointment must be scheduled within 15 minutes of staff arrival and the last certification appointment scheduled one hour before the clinic closing. The spacing of appointments will depend upon CPA resources and clerical staff availability. Clinics can plan to schedule one certification appointment every 20-30 minutes per CPA.

The following information must be conveyed to participants about their appointment:

1. What to bring:
 - a) Proof of identity of parent/guardian/caretaker and person to be certified,
 - b) Proof of residency,
 - c) Proof of income for the household,
 - d) Immunization records for children up to 2 years of age,
 - e) Proof of multiple fetuses (if applicable),
 - f) Proof of foster care and custody (if applicable).
2. Who to bring: person for whom the appointment was made. If the person is applying for a child or infant, tell them to bring the child or infant with them. If circumstances prevent this, check with the WIC Coordinator for possible solutions.

Other information that should be conveyed to participants:

1. What to expect during the appointment: hemoglobin (blood) testing, weight and height measurements, nutrition assessments, discussion with the nutritionist, and education.
2. Let the caller know that sometimes the length of the certification process varies. They should be prepared by bringing extra diapers, snacks (if allowed in your clinic, check with your coordinator) or other nutrition for their child/children.
3. How to get to the WIC clinic, if needed.
4. Confirmation of date and time of appointment, if applicable.

Rescheduling pregnant women

Pregnant WIC applicants who miss their initial prenatal certification appointment must be contacted either by phone or in writing in an attempt to reschedule the missed appointment. (See Policy and Procedure Manual, Certification Chapter, Missed Initial Prenatal Appointment from Section 01- Timelines, Appointments and Prescreening for further information)

Late Applicants

There will be an allowance of at least a 15 minute grace period for certification appointments. If the applicant is over 15 minutes late the Local Agency should attempt to work the late arrival into the day's schedule. If they can not be worked in, the appointment should be rescheduled for the next available slot.



Part 4: Certification Process

Certification: A process whereby an applicant's eligibility is determined. The following information is checked/documentated in the ADP system during the certification process:

1. Name and address of the applicant
2. Date of birth of applicant
3. Phone number-if available
4. Email address, if available
5. Proof of identification presented for each applicant
6. Proof of residency for each applicant
7. Category for the participant
8. Number in household
9. Annual Income of household
10. Proof of income OR;
11. Proof of income eligibility (adjunctive or automatic)
12. Height, weight, hemoglobin test
13. Health information
14. Medical and/ Diet Intake
15. Medical and/or nutritional risk
16. Food package determination
17. Nutrition education provided
18. Check issuance
19. Second nutrition contact scheduled



Part 5: Determining Eligibility

Category

1. **Pregnant** - A woman who is pregnant.
 - Certify for the duration of her pregnancy and up to the last day of the month in which the infant becomes six weeks old or the pregnancy ends or is terminated.
2. **Non-Breastfeeding Postpartum** – Certify up the last day of the sixth month after the baby is born or the pregnancy ends or is terminated.
3. **Breastfeeding** - A woman who is fully or partially breastfeeding an infant, including non-birth mothers.
 - Certify her for up to the last day of the month in which the infant turns one year old, or until the woman ceases breast feeding, whichever occurs first. (See Section 4- Certification Process, Certification Periods for further information)
4. **Infant** - A baby under one year of age.
 - Certify infants from birth up to six months of age until their first birthday.
 - Certify infants six to 12 months of age for six months.
 - Certification expires on the last day of the month in which the infant turns one year of age.
5. **Child** - A person between one year and up to five years of age.
 - Certify children for six-month periods up to the end of the month in which the child reaches their fifth birthday.

Physical Presence

All applicants and parent/guardian/caretakers of individuals seeking participation in the WIC Program must be physically present at each certification; and the parent/guardian/caretaker must accompany infant, child and minor prenatal/postpartum applicants at each certification. Physical presence is documented by Local Agency staff in the ADP system.

The exceptions to the applicant being physically present include:

- A medical condition that necessitates the use of medical equipment that is not easily transportable;
- A medical condition that requires confinement to bed rest; or
- A serious illness that may be exacerbated by coming into the clinic.

The following written documentation is required:

- A statement provided by the health care provider indicating the medical condition or illness. This is placed in the daily file.

- The applicant's height, weight, and blood work will be obtained from the health care provider.

The Competent Professional Authority (CPA) assesses and documents the length of exemption from physical presence of applicant:

- Short-term exemption: An applicant/participant may be exempt from physical presence requirement for one certification period.
- Long-term exemption: An applicant/participant may be exempt for greater than one certification period.

A designee of the adult parent/guardian can accompany an infant, child or minor prenatal/postpartum applicant under certain circumstances:

- Serious illness or medical condition

Written documentation required:

- A statement by the healthcare provider indicating the medical condition or illness. This is placed in the daily file.

The minor prenatal/postpartum cannot be the designee.

Residency

To be eligible for Indiana WIC program benefits, applicants must live in Indiana. There is no "length of stay" requirement for WIC.

An applicant must show proof of residency at certification. The applicant can use any of the following documents that show a name with a current address to meet the residency requirement (all documents must have the applicant's current name and address):

- A Bank Account Statement, not a checkbook
- COP form (Consolidated Outreach Program)
- Mail (no personal letters or cards)
- Current pay stub
- Current SSI check
- Current vehicle registration
- Current driver's license
- Social Security/food stamps/TANF award letter
- Hoosier Healthwise/Medicaid award letter
- Hoosier Healthwise/Medicaid printout
- Housing authority ID card with address
- Lease/rental receipt
- Letter from landlord

- Letter from another resident in household
- Letter from shelter/hotel/motel
- New infant birth record with address
- Valid Indiana ID

Applicants who present with the following situations may require an exception regarding proof of residency and shall complete the No Proof Reporting Form (Letter C) which is to be placed in the daily file:

- Theft
- Disaster
- A homeless individual
- A migrant farm-worker

Applicants who do not meet the residency requirements (live outside of Indiana) shall receive the Ineligibility or Termination Form (Letter A).

Identification

Applicants and parent/guardian/caretaker must show proof of identity at each certification.

Note: US Citizenship is NOT required to participate in the WIC program.

Proof of identity includes, but is not limited to the following:

- Birth Certificate
- Driver's License
- Hospital records (for example, crib card, hospital ID, bracelet, discharge papers)
- Immunization Record
- Marriage license
- Medicaid/Hoosier Healthwise card or verification strip
- Military ID
- Official State issued ID card
- Passport/immigration records
- School/employee ID card with picture
- Social Security card
- Voter Registration card
- WIC ID Folder at subsequent certifications

Applicants who present with the following situations may require an exemption to proof of ID shall complete a No Proof Reporting Form (Letter C) which must be filed in the daily folder:

- Victim of theft, or disaster
- Homeless individuals
- Migrant farm workers

Income

Applicants with total gross income of household equal to or less than 185% of the federal poverty level are considered income eligible for WIC. Income guidelines become effective beginning April 1 and last through March 31 of the following year. The local agencies are notified by the Indiana State WIC program of these annual changes.

Income is calculated for the entire household. *Household size should be determined first so income for the entire household can be assessed.*

Household size – a group of people, not necessarily related, living together as one economic unit (except that residents of a homeless facility or an institution are not considered as members of a single family). Household/family members share income and consumption of goods and/or services.

There are many different situations that can affect household size. For example: The unborn child of a pregnant woman is counted as a member of the household. Multiple fetuses increase the family size by the number of fetuses the pregnant woman is carrying, but proof of the number of fetuses is required. In situations where two households or economic units reside under one roof, each household must be economically independent of one another and must have its own source of income. (See Policy and Procedure manual, Certification Chapter, Section 02 – Intake Process, Income – Income Guidelines for further information)

Temporary Living Situations

For those individuals temporarily living in another household, only the income for the individual/family who is applying for WIC is used to determine household unit. For example, if a pregnant woman is temporarily staying with her parents or friends for a short time, and are not providing any financial support, only her income would be considered in determining her income eligibility. (Temporary is defines as a one year period.)

Applicants participating in other assistance programs

Applicants are considered **adjunctive** income eligible if they are receiving:

- Medicaid or Hoosier Healthwise (Plans A, B, D or E; *income must be evaluated for Plan C)
- Food Stamps or Temporary Assistance for Needy Families (TANF)

Or if any one (1) person in the economic unit:

- Receives Food Stamps or Temporary Assistance for Needy Families (TANF) (Documentation is required to verify that the WIC applicant resides with the individual certified as eligible to receive TANF such as the eligibility letter or printout) or
- Is a pregnant woman or infant receiving Medicaid/Hoosier Healthwise (who may or may not be enrolled in WIC)

Applicants that do not meet the above criteria must have their income screened.



Types of Income

- Gross wages, salaries, commissions, or fees, including overtime
- Net income from farm or non-farm self employment, use IRS form 1040, line 22 (total income)
- Social Security benefits, including SSI
- Other disability compensation
- Dividends or interest of savings, bonds, estates, trusts, or net rental income
- Public assistance or welfare payments
- Military Pay: Basic pay; Conus Cola (Continental United States Cost of Living Allowance); BAS (Basic Allowance for Subsistence)
- Unemployment money paid to people who have lost their jobs; striker's benefits
- Social Security
- Disability Benefits

Refer to Policy and Procedure Manual, Certification Chapter, Section 02 Intake Process, Income – Standard Income Guidelines for additional types of income.

The following documents serve as proof of income:

- Pay stubs for all household income received within the last 30 days.

- Statement from the participant's employer showing gross earnings for a specified pay period
- Letter from a person contributing financially to the household, but who does not live at the residence
- Letter from an employer if wages are paid on a cash basis. (babysitting, lawn care, etc.)
- Termination/layoff notice from previous employer
- Pay stub or letter from Social Security stating amount of earnings
- Recent Leave & Earnings Statement for military personnel
- Income tax return for the most current calendar year pertaining to farmers and self-employed
- Income documentation submitted to Immigration & Naturalization Service by foreign students to obtain a student Visa or information provided by the college/university Financial Aid Office

Calculating Income

Definition: Gross Income is income before any deductions or taxes are taken out.

1. For each member of the household, staff will calculate and enter into the ADP the gross income for the last 30 days. The annual income will be calculated by the ADP. Bonus checks and over-time from the last 30 days must be included in the gross income.
2. Check Stubs required for last 30 days:
 - For weekly pay periods: 4 pay stubs
 - For bi-weekly pay periods: 2 pay stubs
 - For semi-monthly pay periods: 2 pay stubs
 - For monthly pay periods: 1 pay stub
3. Two or more checks showing different gross amounts will be averaged. The average will be entered in the ADP by pay frequency.
4. Partial income (e.g. due to new job, lost job) declared for the past 30 days is entered into ADP as total monthly income.
5. For self-employed applicants or other household members, enter income from IRS Form 1040, line 22 as annual income.
6. Lump sum payments are entered into the ADP as annual income.
7. A handwritten pay check may be accepted if staff can verify it is a valid payroll check.
8. The Federal Eligibility Income table is the MAXIMUM income allowed by WIC.

Military Income/Pay:

Salary calculation of Military Personnel includes:

- Basic Pay
- CONUS COLA (Continental United States Cost of Living Adjustment/ This may not be on

- every paycheck. If it is for service members who are assigned to high-cost locations.)
- BAS (Basic Allowance for Subsistence or may also be seen on paycheck as Subsistence Allowance)

Exclude the following from calculating income for military:

- BAH- off base housing and privatized house in the US
- FSH- Over seas housing for military personnel only
- OHA
- Any income that Military personnel designates to their spouse and/or child
- OCONUS Cola
- FSSA

No other form of payment listed on the military pay stub is used to calculate income for military households.

MIDWEST REGION
CONSIDERATION OF MILITARY INCOME

(Last Update 10/06)

STATE	BAS INCLUDED AS INCOME (Mandatory)	CONUS COLA INCLUDED AS INCOME (Mandatory)	FSSA EXCLUDED AS INCOME (Mandatory)	BAH EXCLUDED AS INCOME (Option)	FSH EXCLUDED AS INCOME (Option)	OHA EXCLUDED AS INCOME (Option)	OCONUS COLA EXCLUDED AS INCOME (Option)	POLICY CITATION-STATE PLAN
ILLINOIS				Yes- S. Plan			Yes- S. Plan	Pt 3 Sec 1
INDIANA	Yes	Yes	Yes	Yes- S. Plan	Yes	Yes	Yes- S. Plan	Policy 104.4
MICHIGAN				Yes- S. Plan			Yes- S. Plan	Policy 2.03
MINNESOTA				Yes- S. Plan			Yes- S. Plan	Policy 5.2
OHIO				Yes- S. Plan			Yes- S. Plan	appendix
WISCONSIN				Yes- S. Plan			Yes- S. Plan	Policy 2.3

BAS- Basic Allowance for Subsistence
 CONUS COLA- Continental United States Cost of Living Adjustment
 FSSA- Family Subsistence Supplemental Allowance
 BAH- Basic Allowance for Housing
 FSH- Family Separation Housing
 OHA- Overseas Housing Allowance
 OCONUS COLA- Overseas Continental United States Cost of Living Allowance

References: CFR 246.7 (d) (iv) (1) (2)
 CFR 246.7 (d) (2) (ii)
 WIC Final Policy Memorandum #2003-3- Family Size and Income Determinations for Military Families
 WIC Final Policy Memorandum #2001-5 Revision 2-Treatment of FSSA in WIC Eligibility Determinations

College Students

Income should be calculated excluding money given for tuition and direct school costs. If subsistence is given periodically as a lump sum, take the length of time the amount covers and divide that by the number of months, after tuition cost are subtracted. Bank statements are often the source of this information. If savings is a source of income, look at monthly withdrawals to calculate monthly income.

Foreign students and other foreign applicants shall be screened for income eligibility as any other applicant. Foreign applicants should not be asked questions regarding citizenship since there are no citizenship requirements for WIC eligibility.

Applicants with NO Proof of Income

Refers to participants having income, but no proof at the time of appointment due to being a victim of theft, loss or disaster; if they are homeless, being a migrant.

Form Letter C must be completed.

Declaration of NO Income

Declaration of NO income *refers to Zero Income*, or a participant having no income within the last 30 days prior to the appointment. Ask how they are supporting their family on an on-going basis and how they obtain basic living necessities such as food, shelter, medical care, and clothing. Means of support must be included in the household income.

Note: "No Proof of Income" is not the same as "No Income".

Form Letter C

Form Letter C "No Proof Reporting Form" is used when individual has:

- No proof of income
- No proof of address (residence)
- No proof of identity

This form is used because of homelessness, theft, disaster or if an applicant is a migrant worker.

Please refer to Policy and Procedure Manual, Certification Chapter, Section 02- Intake Process, Identification, Income- Adjunctive Income Sources and Special Consideration, and Residency Requirements for additional information.

Part 6: Special Groups

Participant Transfers

Participants may move from one agency to another or from one state to another during their certification period.

- The transfer information is good until the end of the participant's certification period. You do not need to reassess their eligibility based on income or nutritional risk if they are still within a current certification period.
- If the participant is outside of the certification period, a new certification must be completed.

Types of Transfers:

In-State Transfers, Out-of-State Transfers, Transfers to another state

1. In-State Transfers

- A person who transfers *to the service area of one local agency to another within the State of Indiana* are accepted as eligible on the basis of his/her Indiana WIC Program ID Folder or other ID.
- Utilizing the folder, the clerk uses the information to transfer the participant into the new clinic via the ADP application.
- The ADP application shall be used to verify that the 2nd nutrition education contact has been completed. If needed, the nutrition education contact shall be completed or scheduled.
- Checks should be issued if the participant has not received checks for the current month.
- Clinic staff should issue a new ID folder and vendor list.
- Give the participant the names, addresses, and telephone numbers of referral agencies that serve the area near the participant's new address.

2. Out of State Transfers

When participants move into your agency's area FROM ANOTHER STATE he/she must show:

1. A verification of certification (VOC) card and/or printout showing valid certification dates;
2. Documentation of ID; and
3. Documentation of residency.

A VOC contains the following information:

- Name of participant
- Date the certification was performed
- Date income eligibility was last determined
- Nutritional risk conditions of the participant
- Date the certification period expires
- Signature and printed or typed name of the certifying local agency official
- Name and address of the certifying local agency
- An identification number or some other means of accountability.

States may include additional information on a VOC and there is information that will need to be obtained to complete a transfer within the computer system. It is very important that the remaining checks issued by the other state and the dates for using them is verified before additional checks from Indiana are issued.

Any out of state food checks that have been turned into the local WIC clinic in exchange for Indiana checks, need to be voided and mailed back to the issuing state's clinic. If the state in question requests the checks be shredded, record the clinic name, individual's name and a statement regarding the request in the general notes.

What should be provided to participants who transfer into your agency?

Out of State Transfers:

- An orientation to the Indiana program.
- Appropriate referrals.
- Participants' rights and responsibilities
- A newly prescribed food package and WIC checks.
- A current Indiana WIC approved food list.
- An Indiana WIC ID folder.
- A list of current Indiana WIC vendors.

In state transfers:

- Appropriate referrals
- A new WIC ID Folder

What happens if the certification period for the transferring participant does not have VOC information?

1. Clinic staff shall contact the previous state for VOC information.

- a) verbal confirmation of certification end date may be documented in general note or,
 - b) Clinic may request written confirmation to be mailed or faxed.
2. If information can not be verified or they are not in a valid certification period:
- a) Treat them as new applicants (unless they were on WIC in Indiana in the past, then open the original folder and complete a new certification).
 - b) Process the application and obtain new medical information, income, identity, and address verification. Determine whether they are eligible.

3. Transfers to another state

If the person is moving from your agency to another State

- Encourage them to continue to participate in the WIC program.
- Print a copy of the participant's VOC form from the automated system and instruct them on its use.
- Instruct them to take the VOC form, along with their WIC ID folder, to their appointment at the clinic in their new state of residency.
- Check the participant's ID/VOC to ensure all information: certification dates, nutrition risk, date of income eligibility, and signature are complete and up-to-date. She will need this at her new agency.
- Advise them to contact the clinic there to make an appointment and to find out any additional information they will need to complete the transfer (i.e. proof of residency, etc.).
- Instruct the participant to take any leftover WIC Checks to her new agency to exchange them for WIC program benefits from her new state.
- If contacted by other states requesting VOC information, clinic staff will:
 - 1) Obtain the party's name and telephone number, and call back to verify the authenticity of the WIC office.
 - 2) Upon verification release information regarding certification dates, check issuance, and additional information as requested.

4. WIC Overseas Program

The WIC Overseas Program provides WIC benefits to

- Members of the armed forces on duty at stations outside the U.S.,
- Civilians who are employees of a military department who are U.S. national and live outside the U.S.,
- Employees of Department of Defense contractors who are U.S. Nationals living outside the U.S. and
- Dependents (spouses and children) of any of the above.

Staff should instruct participants transferring out of the country that they may be eligible for the Overseas WIC Program.

A VOC document should be issued to the participant.

To contact the WIC Overseas Program go to www.tricare.osd.mil/wic/default.cfm

WIC Overseas Participant Transferring to Indiana

Transfers must present VOC document showing valid certification dates, documentation of ID and residency.

Clinic staff shall search the statewide database to determine if the applicant is in the ADP database.

- 1) If the participant's record is found, staff shall transfer the applicant into their service site and enter the VOC certification end date.
- 2) If the participant's record is not found, the applicant must be pre screened and VOC certification end date entered.

All transfer procedures are the same. (See Policy and Procedure Manual, Certification Chapter, Section 02- Intake Process, Transferring Participants for further information.)

Migrant Farm Workers

- Income determination for migrant workers is good for one year according to Federal Regulations.
- A determination by any state that the income of a migrant has met the WIC income guidelines should satisfy the income screening for subsequent certifications in any state for a one-year period.

The Homeless

WIC Federal Regulations define homeless as follows:

- Lacks a fixed, regular nighttime residence (e.g. sleeps in a car)
- Primary nighttime residence is a shelter
- Primary nighttime residence is a temporary facility designed for those who should be institutionalized
- Primary nighttime residence is temporarily someone else's home
- Primary nighttime residence is a public or private place not designed as a regular sleeping place (e.g. a church)

Special Considerations:

- When calculating the income of homeless individuals, only the income of immediate family members also in the facility or residence should be included in the income determination. Do not include the income of anyone else in the facility or residence

where the applicant is temporarily staying. If they can not provide proof of income they can complete Form Letter C.

- Because a person participating in WIC is residing in a facility or shelter, the shelter should not (for example):
 - Add the person's WIC foods to their food supply
 - Reduce the food it gives the person on WIC
 - Reduce any support to the person on WIC
- Food bought with WIC checks should not be shared with other residents of the facility or shelter. WIC foods are for the participant's nutritional needs only.
- Staff of the homeless facility or shelter cannot regularly pick up WIC checks for the WIC participants who live there, *unless they have been designated as a proxy*.
 - This protects the WIC participant.
 - It ensures that the participant's contacts with the local WIC agency, health care, and referral services are not cut off.

Foster Children

- Foster parents must be able to provide written documentation that the minor participant/applicant is in their legal custody.
- The lack of proof of custody is not a barrier to service.
- If proof of custody cannot be provided at certification, the foster parent will complete a Foster Parent Custody Statement. It must be explained to the foster parent that the statement is only valid for 90 days and will be given three months of checks. The foster parent must complete and sign the Foster Parent Custody Statement on the Legal Guardian/Foster Parent/Caretaker/Emancipated Minor Form (Letter D). The original should be filed in the daily file.
- If the foster parent fails to return with valid proof of custody after 90 days, the participant must be manually terminated from the program. The Foster parent will receive a signed copy of the Ineligibility or Termination (Letter A). They may be reinstated when custody is presented.
- A foster child is designated as a household of one; therefore income from the household is not included for determining eligibility.
- Proof of income may include automatic eligibility as a recipient of TANF or Medicaid/Hoosier Healthwise or payments made by the welfare agency for the care of the applicant.

Minor Applicants

Prenatal and postpartum minor applicants must be accompanied by their parent/guardian/caretaker for certification unless they are legally emancipated or able to sign for their own healthcare. If the parent/guardian/caretaker is not present, the application process cannot proceed.

Definitions (Prenatal and Postpartum Minor Applicants)

Minor- Prenatal or postpartum applicant who is under the age of 18 years.

Legally emancipated minor for the Indiana WIC Program- a minor prenatal or postpartum applicant who presents legal documentation of emancipation.

A minor who signs for her own healthcare for the Indiana WIC Program- a minor prenatal or postpartum applicant who

1. is
 - a. at least 14 year of age; and
 - b. not dependent on a parent for support (i.e., shelter, food, etc.); and
 - c. living apart from the minor's parents or from a guardian/caretaker (loco parentis); and
 - d. managing their own affairs; or
2. is or has been married, or
3. is in the military of the United States; or
4. is authorized to consent to health care through another state statute.

Legally emancipated minor

She must show proof of emancipation and complete the Emancipated Minor section of the Legal Guardian/Foster Parent/Caretaker/Emancipated Minor Statement (Letter D) at each certification. The original copy will be placed in the daily file.

Minor who signs for her own healthcare

She must sign the applicable line in the Minor Able to Sign for Healthcare Section of Letter D, at each certification. The original copy will be placed in the daily file.

Minor who is living with a guardian/caretaker and not emancipated and not able to sign for healthcare:

Caretaker or guardian must sign the applicable section of the Letter D at each certification or the application cannot proceed. The original copy will be placed in the daily file.

CARETAKER

Caretaker: Someone who is financially responsible and provides daily care for the non-emancipated minor WIC applicant/participant **in the absence of a legal guardian**, but is not their legal guardian or parent. The Caretaker must complete and sign the CARETAKER STATEMENT on Letter D. The original should be filed in the daily file. The Caretaker Statement is valid only for the current certification period. The caretaker must be present at certification for the non-emancipated minor applicants/participants.

Examples of when a caretaker form may be used:

- A 14 year old girl is pregnant and living with her boyfriend's parents who are now taking care of her expenses and her parents are not in the picture.
- Children/infants left with relatives and the whereabouts of their parents/guardians are unknown.

Signature Page and WIC ID Folder

Prenatal Minor: parent/guardian/caretaker must sign the WIC Signature Page for Certification and the WIC ID Folder. The minor is listed as a proxy on the ID Folder.

Postpartum Minor: parent/guardian/caretaker must sign the WIC Signature Page for the minor's Certification and the minor's WIC ID Folder. The minor signs the WIC Signature Page for Certification for the infant/child, and for checks as a proxy.

The ID folder will be reissued if the minor turns 18 during the certification period or if her emancipation status changes.

Mandated Reporting

Child Protective Services (CPS) must be contacted:

- a. Anytime a prenatal mother is <14 years of age (no minor under the age of 14 can consent to anything), or
- b. When a prenatal mother is ≥ 14 and <16 years of age and alleges the father is 18 years of age or older (the age of consent in the state of Indiana is 16).

Part 7: WIC Signature Page for Certification

One WIC Signature Page for Certification must be completed for each household at the certification.

When is the WIC Signature Page Signed?

- Prior to evaluating applicant's anthropometrics and hemoglobin

At each certification the applicant and/or parent/guardian/caretaker must read, or have read to them, the Consent Statement and Rights and Responsibilities on the WIC Signature Page for Certification. Afterward, the signature lines are signed. The CPA must sign and date on the appropriate line after nutritional risk factors have been assessed.

For eligible applicants the WIC Signature Page for Certification is placed in the daily file. For ineligible applicants the signature page is filed with the Ineligibility or Termination Form (Letter A) in the Ineligible File.

Part 8: Ineligible Applicants and Terminated Participants

An applicant determined to be ineligible for the program or a participant being terminated from the program shall be notified in writing of the reason(s) for the ineligibility or termination and of the right to a fair hearing.

Applicants are ineligible because...

- Do not meet categorical requirements
- Residence is not in Indiana
- Failure to bring proof of income, residency or identity if the new applicant can not be rescheduled within the 10 to 20 day period from the initial contact.

(For example, if a Special Nutrition Risk applicant contacts the agency on 10/26 and schedules an appointment for 11/08, the applicant comes to the clinic for her appointment but does not bring proof of income, she is re-scheduled for an appointment of 11/12 [day 11], the applicant must be given Letter A.)- This must be documented in a note so that the processing timeframe is considered met.

- Household income exceeds standards
- Minor failed to bring parent, guardian, caretaker or adult designee with documentation of consent or proof of legal emancipation
- No nutritional risk
- Indiana is not serving the priority group

A signed and dated copy of the Ineligibility or Termination Form (Letter A) is given to the applicant/parent/guardian. Form Letter A is placed in the ineligible file.

Participants are terminated from the program because...

- Household is determined to be over income
- Participant was certified for the WIC Program in error
- Participant's WIC category changes during certification and no longer has a medical/nutritional risk factor;
- Parent/guardian failure to return with proof of custody (foster care) for minor child;
- Program violation;
- Funding shortage

A signed and dated copy of the Ineligibility or Termination Form (Letter A) is received by the applicant/parent/guardian 15 days prior to the termination. A copy of Form Letter A is placed in the Ineligible-Terminated file.

Participants who are terminated in a valid certification should return any checks where the "First Day to Use" is after the termination date. A participant who is being terminated in a valid certification period and is due to be issued checks is allowed only one month of checks. No checks will be issued after the termination date.

Part 9: Voter Registration

The opportunity to register to vote must be offered at all WIC clinics, at certification for all applicants 18 years of age or older.

Full-service voter registration agencies are agencies where the employees ask clients/applicants whether or not they would like to register to vote during their visit. These employees offer assistance in filling out the form, and the agency returns it to the appropriate county voter registration office for processing. The agencies required by law to offer this service are:

- Bureau of Motor Vehicles (BMV) license branches
- Certain public assistance offices, including:
 - Indiana State Department of Health (ISDH) Women, Infant and Children (WIC) Offices
 - Family and Social Service Administration (FSSA) Division of Family and Children (DFC) Offices
- Disability offices
 - Indiana Area Agencies on Aging
 - FSSA Division of Disability, Aging and Rehabilitation Services Offices
- Armed Forces Recruitment Offices

- Board of Registration Offices that are not located in the same building as the principal office of the circuit court clerk or board of registration office
- Workforce Development Offices offering unemployment compensation (effective 1/1/96)
- Certain City Clerk or Clerk-Treasurer or Town Clerk-Treasurer Offices (depending on size of the town and services provided at the office)

The procedure for full-service voter registration at any agency is uniform. When a client visits the office to 1) apply for assistance/service, or 2) recertify assistance/service, the client must be asked, "If you are not registered to vote where you live now, would you like to apply to register to vote here today?" The registration is printed directly out of the ADP system when the client says yes they would like to register to vote. Have them sign the registration form. The registrations are then forwarded to the appropriate county voter registration office for processing, **within 10 days of completion of the form**, by hand delivery or first class mail.

All applicants must be asked if they are registered to vote. If they are not, the clinic is to provide the opportunity to register to vote. If an individual chooses to register to vote, the form is printed off automatically; the applicant should check the information on the form and sign.

In order to register to vote, a person must be a citizen of the United States and at least 18 years of age on or before Election Day.



Part 10: Paper Charts

Beginning October 1, 2007 there will no longer be a paper participant file. All information will be entered into the ADP System. There will be four paper charts that each local agency must have at each clinic: a Daily file, a prescription file, an Ineligible/Termination File, and a Lost/Stolen check Replacement File.

Daily File: This will contain the WIC Signature Page and Form letters B, C, and D for all participants seen that day.

Prescription File: This will contain all prescriptions for special formulas. Organization of the Prescription File is up to each local agency, but it needs to be arranged so prescriptions can be found easily, i.e. alphabetical/chronological; monthly/quarterly/yearly depending on size of clinic.

Ineligible/Termination File: This will contain all ineligible and termination paperwork; including: the Letter A and signature page for each applicant found ineligible and each participant that is terminated. This is a yearly file.

Lost/Stolen Check File: This will contain all Letter E forms for the year. Letter E is completed if participant has lost or stolen checks that are being replaced.

Part 11: Check Issuance and Identification Folder

Separation of Duties: Maintaining integrity in check issuance.

Separation of duties is required during certification and WIC check issuance to prevent fraud, abuse, or the appearance of either.

The staff person who logs in the checks for the agency and/or issues them from inventory to the clinic cannot issue WIC checks to participants.

The staff person who issues WIC checks to participants cannot order and inventory WIC checks.

However, in small clinics where there are only two or three staff or in situations where staff is insufficient to implement this policy, the WIC Coordinator or designee must discuss this situation with a State WIC Clinic Consultant. Separation of duties refers to check integrity and does not exclude the cross training of staff in other areas of daily operations.

The staff person who performs the complete certification from income eligibility determination to nutrition risk determination cannot issue checks to the participant.

However, if there are two people involved in the certification either person can issue checks. For example if Jane determines income eligibility, and Mary performs height and weight and determines nutrition eligibility then either Jane or Mary can issue checks. Also, the local agency coordinator can develop an effective alternate policy for practical circumstances, such as having only one employee in the clinic.

NOTE: Employees may not complete or issue WIC checks, ID folders, or other WIC benefits for themselves, their family members, or persons for whom they are acting as proxy. (See Subject Letter 04 07 for further information)

Tri-Monthly Check Issuance

All checks are issued tri-monthly except:

- Prenatal clients who have not had prenatal care at the time of the WIC appointment
- Special nutrition risk participants (unless waived by the CPA for tri-monthly issuance – documentation required, must be documented in SOAP note)
- **Immunization records not provided***
- Second offense sanction for participant cashing checks prior to the first date of use or after the last date of use
- Women with delayed blood work

***Infants and children who do not provide their immunization record or are not found in the CHIRP (Children and Hoosiers Immunization Registry Program) system will be placed on monthly check pick up until an immunization record is obtained.**

Checks may be issued on a bi-monthly basis in order to coordinate household pick-up frequencies.

Family check issuance cycles

All family members should be placed on the same check issuance cycle adjusting to the family member with the shortest frequency. If a family member's certification expires in the next three months, checks should only be issued for the family up to the date the certification is due. Advanced check issuance may resume following the certification. Alert client to short usage dates due to cycle adjustments made in the current month.

Procedures for check issuance

The WIC ID Folder must be presented at each check issuance. If the participant, parent/guardian/caretaker does not present the WIC ID Folder, a valid ID must be presented prior to check issuance. If a proxy does not present the WIC ID Folder, checks cannot be issued.

A signature of the participant, parent/guardian/caretaker or proxy must be obtained by electronic signature (E-Pad) to document receipt of the checks. If the electronic signature (E-Pad) is not operational an original signature must be obtained on the check register printed from the ADP (go to System Outputs in the Service Site Application, click Reports, go to Check Register Report.)

Voiding and replacing checks

A replacement check can only be provided if the last date to use has not expired. Checks that have been printed in error, damaged and unusable that are returned to the clinic by the participant may be replaced if check number or use dates are legible. Checks will be entered into the ADP system as VOID only if the check is in the hand of the person voiding the check. Checks which have been voided must be shredded or destroyed.