



SECTION: Certification
SUBJECT: **INCOME ELIGIBILITY: Change In Income**
DATE: July 1, 2016 (*revised, released pending USDA approval*)

615

POLICY: Local WIC programs shall reassess a participant's income during a certification period only if: 1) information indicates the participant was misrepresenting income when applying to the program, 2) new information indicates the participant's income has changed, or 3) the participant or caregiver contacts the clinic to report a change in income. WIC staff may request verification of income if there is reasonable evidence that the applicant has provided inaccurate or false information.

PURPOSE: To ensure that WIC services are targeted at income eligible applicants, as defined by WIC regulations. To focus local program staff time on doing thorough income screenings at each certification visit.

RELEVANT REGULATIONS: 7 CFR §246.7(h)—Actions affecting participation in mid-certification
7 CFR §246.7(d)(2)(v)(D)-Verification of Income Source
ASM 99-54—Strengthening Integrity in the WIC Certification Process
WPM 2011-7 – Conversion Factors for WIC Income Eligibility Guidelines (IEGs)
WPM 2013-3 – Income Eligibility Guidance

OREGON WIC PPM REFERENCES: ♦ 590—Program Integrity: Participant Violations
♦ 611—Income Eligibility: Determining Income Eligibility
♦ 636—Ineligibility and Termination from WIC

DEFINITIONS:

<i>Reassessment of income</i>	A formal screening of income eligibility using WIC income guidelines.
<i>Receiving information</i>	Applies to information received by a WIC program through means other than a WIC screening of the household income.
<i>Income verification</i>	A process whereby the information presented, such as pay stubs, is validated through an external source of information other than the applicant. Such sources could include employer verification of wages, contacting the local TANF office, a statement from a reliable third party that has knowledge of the individual's income.

PROCEDURE:

- 1.0 Local WIC programs shall reassess a participant's income in certain situations. Reassessment is required if:
 - 1.1 Information indicates the individual may have misrepresented income when applying to the program;

INCOME ELIGIBILITY: CHANGE IN INCOME, *Cont.*

- 1.2 The local program receives new information indicating the participant's income has changed; or
- 1.3 A household member reports:
 - A change in income or household size, whether during the individual's certification period or during the certification of another family member.
 - They are no longer receiving SNAP, TANF, or Medicaid (OHP).
 - A change in custody, which then results in change of income or household size.

- 2.0 Local programs may receive information about a change in participants' income from a variety of sources: from the participant; through an anonymous telephone call to the clinic; from income reported for another program which is then added to a participant's integrated record; through application for WIC services by another member of the participant's family; etc.

- 3.0 When a local program receives information about a change in a participant's income or potential misrepresentation of income, the participant's income eligibility must be reassessed if there are more than 90 days before the end of the current certification. The reassessment must be done through a formal WIC income screening as outlined in ♦611—Income Eligibility: Determining Income Eligibility.
 - 3.1 If income eligibility was originally based on adjunctive eligibility and the individual no longer participates in that program, reassess the family's income using the traditional method.

- Terminate from WIC if over income*** 4.0 Once a reassessment is done, the local program shall terminate WIC services to the participant and other members of their household if their income is now above the WIC limit.

- Household above WIC income limit*** 5.0 If a local WIC program is screening income for another member of the participant's household, and the screening indicates that household income is now over the WIC limit, all members of the household must be terminated from WIC services. In this case, a formal reassessment of income was accomplished through the WIC income screening process for the new applicant. Follow procedures for terminating participants outlined in ♦636—Ineligibility and Termination from WIC

- Verification of income*** 6.0 Local program staff may verify reported income if reasonable evidence is showing that the applicant or participant has given inaccurate or untrue information.

INCOME ELIGIBILITY: CHANGE IN INCOME, *Cont.*

(Verification of income)

6.1 Reasons for seeking verification of income may include but are not limited to the following:

- Complaint made by another individual
- Contradictory information given by applicant or participant
- Information WIC staff may have about the financial situation of the individual.

Civil rights violation

6.2 Staff shall apply fair and consistent criteria when determining if inaccurate or false information is evident or suspected and requiring income verification. It is critical that such requests not violate applicants' civil rights. It is a civil rights violation, for example, for an income screener to routinely request verification from applicants of a particular racial or ethnic heritage, for no reason other than that heritage.

Questionable cases

6.3 If there is evidence to suspect that the applicant or participant provided inaccurate or false income information, proceed as follows:

Documentation of verification

6.3.1 Document the reason for requesting income verification in TWIST Enrollment notes.

6.3.2 Ask the individual to bring pay stubs or other forms of income documentation to the clinic for further assessment.

6.3.3 Verify income through an external source. Sources of verification may include employer, the local TANF office, social service worker, or a reliable third party.

6.3.4 Document the verification of income and source of verification in TWIST in case a fair hearing is requested.

6.4 Determine if inaccurate income reported by the individual was an error or intentional and if the applicant or participant is over income.

6.4.1 If the applicant or participant is determined over income, explain the situation and terminate the individual from the program. Follow procedures for terminating participants outlined in ♦ 636—Ineligibility and Termination from WIC.

6.4.2 If the individual intentionally reported inaccurate income and is over income, follow additional procedures for applicant or participant program abuse. Please refer to ♦ 590—Program Integrity: Participant Violations. ★

INCOME ELIGIBILITY: CHANGE IN INCOME, *Cont.*

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