



SECTION: Certification 612
SUBJECT: INCOME ELIGIBILITY: Adjunct or Automatic
Income Eligibility
DATE: October 1, 2014 (*revised*)

POLICY: Oregon WIC applicants or participants meeting specific criteria shall be considered adjunctively or automatically WIC income eligible.

PURPOSE: To extend income eligibility for WIC services to individuals who already participate in other programs with a similar income standard.

RELEVANT 7CFR §246.7 ¶(d)(vi) Adjunct or automatic income eligibility
 7CFR §246.7 (d)(ix) Migrant farm workers

REGULATIONS: ASM 99-54: Strengthening Integrity in the WIC Certification Process

OREGON WIC PPM ◆587—Program Integrity: Dual Participation
REFERENCES: ◆610—Required Proofs: Identity, Residence, Income
 ◆611—Income Eligibility: Determining Income Eligibility
 ◆616—Unavailable Proofs
 ◆615—Income Eligibility: Change in Income

**TWIST TRAINING
MANUAL**

REFERENCES: Chapter 3, Lesson 102, Enrollment

DEFINITIONS: *FDPIR* Food Distribution Program on Indian Reservations is an alternative to SNAP for households on Indian reservations, and low-income Indian households living near reservations. Families may not participate in both FDPIR and SNAP at the same time. Oregon has FDPIR programs at the Burns Paiute Reservation, Klamath Reservation, Siletz and Grande Ronde Reservation, Confederated Tribes of Warm Springs, and Confederated Tribes of the Umatilla.

Household size A person or group of people, related or not, who usually (though not necessarily) live together, and whose income and consumption of goods or services are related and who are not residents of an institution. The key consideration in determining when individuals or groups are a household (or economic unit) is whether they generate the income which sustains them, i.e., room, board and medical care. When determining a household size, count all pregnant women as two, or more, for expected multiple births, unless a woman specifically waives the increase in number.

Income eligible Meets WIC standard for income for household size. Oregon WIC program eligibility standard is 185 percent of the non-farm poverty guidelines prescribed by the U.S. Office of Management and Budget (OMB), adjusted annually.

Individuals Applicants or participants.

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, cont.

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|-------------------------------------|--|
| DEFINITIONS: <i>Medicaid</i> | A federal and State funded portion of the Medical Assistance Program that pays for health care to low income households, and is administered by the Oregon Health Authority (OHA). |
| <i>OHP</i> | Oregon Health Plan: A state program of health assistance and care for low-income Oregonians. The Medicaid component of the OHP is managed by the Oregon Health Authority (OHA). In Oregon, this program may be referred to as Healthy Kids. |
| <i>SNAP</i> | Supplemental Nutrition Assistance Program (formerly known as Food Stamps) is a program administered by the Oregon Department of Human Services (DHS) that provides funds to help low income households buy food. Families are issued an electronic benefits card referred to as the Oregon Trail Card. |
| <i>TANF</i> | Temporary Assistance for Needy Families: A program administered by the Oregon Department of Human Services (DHS) that provides financial assistance to needy children and/or their families. |
| <i>WIC Transfer (VOC) card</i> | Documents issued by WIC programs to members of migrant farm-workers families, and to WIC participants planning to relocate, to expedite transfer of WIC benefits. |

BACKGROUND: Federal regulations require that an applicant or a participant is adjunctively income eligible for WIC benefits if documentation proves that, at the time of their application for WIC the individual:

- Adjunctively income eligible*
- Is certified as fully eligible to receive benefits from either the:
 - √ Supplemental Nutrition Assistance Program (SNAP), or
 - √ Food Distribution Program on Indian Reservations (FDPIR), or
 - √ Medicaid/Oregon Health Plan (OHP), or
 - √ Temporary Assistance for Needy Families (TANF).
 - Is determined presumptively eligible for either TANF or Medicaid/OHP (pending completion of that program’s process), or
 - Is a member of a household with:
 - √ a TANF recipient, or
 - √ a SNAP recipient, or
 - √ a FDPIR recipient, or
 - √ a pregnant woman or infant currently on Medicaid/OHP.

Automatically eligible Federal regulations require automatic income eligibility for migrant farm-workers with current or expired WIC transfer cards provided the income for the migrant farm-workers was determined within the last 12 months.

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, *cont.*

*Adjunct eligible
and above 185%
poverty level*

Federal guidelines state individuals eligible for the above public assistance programs are income eligible for WIC, regardless of different income eligibility guidelines. Therefore, an individual enrolled in one of the four programs is adjunctively income eligible for WIC even if their income exceeds the WIC income limits of 185% of poverty.

PROCEDURE:

*Determining
adjunctive or
automatic
income
eligibility*

- 1.0 All applicants and participants must be screened at certification and recertification for participation in one of the programs that would make them adjunctively or automatically income eligible for WIC.
 - 1.1 Ask if the individual is currently participating in one of the four adjunct programs. Ask to see proof of program eligibility and determine if proof adequately demonstrates current participation. Refer to ¶2.0 for guidelines on determining adjunct income eligibility.
 - 1.2 If no, ask if any household member is participating in one of the four adjunct programs. Refer to ¶3.0 of this policy for guidelines on determining adjunct income eligibility based on a household member's eligibility for public assistance.
 - 1.3 Check if income verification for a migrant farm-worker with a WIC transfer (VOC) card was determined within the last 12 months. Refer to ¶4.0 of this policy for further guidelines on certifying migrant farm-workers who are automatically income eligible.

*Proof of adjunctive
income eligibility*

- 2.0 Check for proof of adjunct income eligibility. Make sure the date of the WIC eligibility screening falls within the eligibility dates indicated on the proof. Documents showing proof of current adjunctive income eligibility may include:

Medicaid/OHP

- 2.1 Eligibility for Medicaid or Oregon Health Plan must be verified using the OHP web portal. The OHP ID card does not indicate current eligibility.
 - 2.1.1 Some OHP plans for children may be referred to as Healthy Kids. Families with children participating in Healthy Kids are adjunctively eligible for WIC even if they report incomes over the income guidelines.

TANF

- 2.2 A Notice of Approval letter indicates participation in TANF and will indicate the eligibility date to receive benefits. The TANF eligibility period is six months.
 - 2.2.1. When reviewing the TANF Notice of Approval letter, calculate six months from the date the letter indicates their eligibility begins, to determine if they are currently eligible.

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, cont.

EXAMPLE: If their letter indicates their benefits start on 01/01/10, their eligibility period will end 06/30/10.

2.2.2. The Notice of Approval letter is proof of presumptive eligibility if the date their benefits start has not yet been reached.

SNAP 2.3 A SNAP Award Letter will show eligibility for SNAP. Eligibility for SNAP is for six months. This letter will indicate the beginning and ending dates of their eligibility period.

FDPIR 2.4 A Food Distribution Program on Indian Reservations (FDPIR) Notice of Eligibility Letter will include the individual's certification period which may vary depending on their situation.

2.4.1 FDPIR is sometimes referred to as "Commodities" by participants but should not be confused with participation in the Commodity Supplemental Food Program (CSFP). Participants cannot participate in both WIC and CSFP at the same time (Refer to ♦587—Program Integrity: Dual Participation for more information), but can participate in FDPIR and WIC at the same time.

Adjunctive income eligibility based on another household member 3.0 A WIC applicant who is a member of a household with a TANF recipient, a SNAP recipient, an FDPIR recipient, or a pregnant woman or infant currently on Medicaid/OHP, shall be adjunctively income eligible for WIC.

3.1 Ask if a household member is currently participating in one of the adjunct programs.

3.2 Determine if there is a pregnant woman or infant in the household who is currently eligible for Medicaid or Oregon Health Plan. If so ask to see proof showing current eligibility.

3.3 Determine if there is a member of the household who is currently participating in TANF, SNAP, or FDPIR. If so ask to see proof showing current eligibility.

3.3.1 The SNAP and FDPIR programs identify a head of household to receive benefits for all household members, therefore, infants and children would not receive benefits individually.

3.4 Review proof to show that the WIC applicant resides with the household member named as the head of household for TANF, SNAP, or FDPIR or resides with a pregnant woman or infant eligible to receive Medicaid/OHP.

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, cont.

- (Adjunctive income eligibility based on another household member)*
- 3.5 Determine if the individual is automatically income eligible based on other household member’s eligibility for one of the adjunct programs.
 - 3.6 See the chart below to help determine who else in the family may be covered by the adjunct eligibility of one family member.

| Applicant/ Participant | Medicaid | TANF | SNAP or FDPIR |
|--|----------------------------|----------------------------|----------------------------|
| Pregnant woman | Self and household members | Self and household members | Self and household members |
| Infant | Self and household members | Self and household members | N/A (See 3.3.1) |
| Child | Self | Self and household members | N/A (See 3.3.1) |
| Any other household member (e.g. postpartum woman) | Self | Self and household members | Self and household members |

- 3.7 Members of a family other than a pregnant woman or infant who are certified as Medicaid/OHP eligible cannot provide adjunctive income eligibility for other WIC applicants in the family.

EXAMPLE: Medicaid/OHP qualified breastfeeding or postpartum women or children cannot use their Medicaid/OHP eligibility as a factor in determining income eligibility for other family members.

Not proof of adjunct eligibility

- 3.8 The following do **NOT** qualify for adequate proof of adjunctive income eligibility:
 - 3.8.1 The EBT card or Oregon Trail Card does NOT qualify as adequate proof of current eligibility in SNAP or TANF.
 - 3.8.2 A health provider card with the insurance provider listed such as a Kaiser card does NOT qualify as documentation of adjunctive eligibility for Medicaid or OHP.

Automatic income eligibility

- 4.0 A migrant farm-worker with a WIC transfer (VOC) card showing income eligibility was determined within the past 12 months is automatically income eligible for WIC.
- 4.1 An expired WIC transfer (VOC) card can still indicate automatic eligibility for the migrant farm-worker if it shows that income eligibility determination was within the last 12 months.

EXAMPLE: A migrant farm-worker comes into the WIC clinic with an expired WIC transfer card and who has been determined income eligible within the last 12

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, *cont.*

(Automatic income eligibility)

months, the individual is considered automatically income eligible. Local program staff need not reassess the migrant farm-worker's income for that certification period.

Migrant farm-worker with a WIC transfer (VOC) card

- 4.2 Once a migrant family's income has been determined for one member, any additional family members enrolled or certified during the twelve-month period would not need to have their income assessed. Local program staff would assess the income at the subsequent certification, if it has not been done for the family within the preceding 12 months.

EXAMPLE: An infant of a migrant farmworker WIC mom would be enrolled with no income assessment (since the mother's income determination date is within twelve months). The infant would be considered eligible for twelve months and would not require an income assessment until the next certification appointment at twelve months of age. In this case, this family's income determination date was past one year because of the infant's eligibility period.

Assessment of income for migrant farm-workers

- 5.0 Assess migrant farm-worker's income determination date on the WIC transfer (VOC) card to determine when a new income eligibility assessment needs to occur. Local program staff only need to assess the income of migrant farm-workers once, per family, per twelve-month period. Reassess income eligibility at the subsequent certification if it falls outside the twelve-month income eligibility period indicated on the WIC transfer card.

- 5.1 Determine income eligibility for the individual when:

- the income determination date has expired (i.e., it is not within the past 12 months),
- staff is not able to obtain transfer documentation for the family, or
- participants need to be recertified and apply for continuation of WIC services at the end of their initial certification.

EXAMPLE: Gabriella Cortez is a migrant farm-worker applying for WIC services in Oregon. Ms. Cortez has a transfer card from a Texas WIC clinic. The card has expired; she is beyond her original six-month certification for anemia. However, income determination on the transfer card **was** made within the previous 12 months. This makes Ms. Cortez

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, *cont.*

(Assessment of income for migrant farm workers)

automatically income eligible for WIC; no further income screening is required. She is beyond her original certification period, so Ms. Cortez will need to be certified for WIC as usual.

Upon certification, Ms. Cortez will be issued a new Oregon transfer card by the local agency. It will show the income and date of income determination from the Texas transfer card, and the certification data from Oregon.

Not proof of automatic eligibility

5.2 The following is **NOT** adequate proof of automatic income eligibility:

5.2.1 Migrant farm-workers with WIC transfer cards showing the income determination date was more than 12 months ago.

If not adjunctively income eligible, use standard income screening

6.0 Proof of adjunct income eligibility based on enrollment in one of the adjunctive programs must be confirmed at the time of enrollment and at recertification. Self-declaration is not sufficient. Documentation must accurately represent current eligibility for one of the adjunct programs. Refer to ♦611—Income Eligibility: Determining Income Eligibility.

6.1 For individuals stating they participate in an adjunctively eligible program who cannot provide proof of adjunct eligibility at the time of certification or re-certification staff must proceed with a standard income screening. If no proof of income is available and a 30-day grace period is provided, proof of adjunctive eligibility or any other proof of income can be provided within that 30-day period. Refer to ♦616—Unavailable Proofs for more information.

Documentation requirements

7.0 Select in TWIST the program used to show adjunctive eligibility and indicate the document provided in the “Proof of Income” field.

7.1 While proof of gross income is not required when proof of adjunctive or automatic eligibility has been established, to meet federal data collection requirements, document declared gross income and household size for adjunctively eligible individuals in TWIST.

7.2 It is possible for an adjunctively eligible individual’s reported income to be above the statewide WIC Income Eligibility Standards of 185% of poverty. In this case, the individual is still income eligible for WIC. Federal guidelines state individuals eligible for adjunctive programs are income eligible for WIC, regardless of different income eligibility program guidelines. Document the reported income and household size in TWIST.

INCOME ELIGIBILITY: Adjunct or Automatic Income Eligibility, cont.

- Household size*** 8.0 Household size is determined for adjunctively eligible individuals the same as for standard income screening with a few exceptions. Refer to ♦611—Income Eligibility: Determination of Income Eligibility, for guidelines on calculating household size. When determining household size for adjunctively eligible individuals:
- Foster children*** 8.1 Count foster children as one-person households.
- 8.1.1 Never apply adjunctive eligibility to the rest of the household of children in foster care.
- Termination of adjunct program benefits*** 9.0 WIC participants who have been determined adjunctively income eligible may have these benefits terminated during their WIC certification period. Participants are not required to report to the WIC office that their OHP, TANF, FDPIR or SNAP benefits have ceased.
- 9.1 If a participant reports such information, assess and determine income eligibility using the standard household and income screening method. Refer to ♦615—Income Eligibility: Change in Income for guidelines.
- 9.2 Terminate WIC services only if the participant is not income eligible for WIC.
- EXAMPLE:** Hester Prynne was certified to receive WIC services in Serene County; she was adjunctively income eligible because she received SNAP. Two months into her WIC certification, Ms. Prynne called Serene County WIC to report that her SNAP benefits had been terminated. Serene County WIC reassessed Ms. Prynne’s income; her income was within the WIC income guidelines, so she was eligible for continued WIC services for the remainder of her certification period.
- Reapply for WIC services*** 10.0 Encourage any applicant who is not income eligible for WIC, but who has a family member that is applying for Medicaid/OHP for herself as pregnant or for an infant, or who has a family member that is applying for TANF or SNAP, to reapply for WIC as soon as the family member receives notification of eligibility. ★

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