

ISSUE DATE: June 1, 2016

TO: WIC Program Coordinators
Other WIC Policy and Procedure Manual owners

FROM: Holly Wilkalis
Oregon WIC Program – Nutrition & Health Screening
OHA Office of Family Health

SUBJECT: **WIC Policy Update 2016-04**



EXPLANATION:

- ◆ **140 – Organization: Purpose and Chart**
 - eWIC language changes.
 - Updates Agency and Function Chart.
- ◆ **400 – Local Program Overview: Responsibilities and Communications**
 - eWIC language changes.
 - Adds forms to the list of materials requiring state approval.
 - Removes log of returned formula from the list of records to be maintained for state WIC review.
- ◆ **435 – Staffing Requirements**
 - Focus of this policy has changed from providing recommendations on staffing for providing WIC services to summarizing the required WIC staff roles.
 - Links provided to policies or webpages that clarify details for each role.
- ◆ **440 – Staff Training Requirements**
 - Deletes requirement that WIC coordinator consult with WIC coordinator’s supervisor to select the training supervisor.
 - Clarifies that training supervisor duties may be delegated to other staff when overseen by the training supervisor. (§9.3)
 - Clarifies the process for “testing out” of modules. (§12.6 and §12.7)
 - Updates revision dates for several staff training modules. (Appendix A)
- ◆ **511 – Food Benefit Issuance**
 - Adds policy references.
 - Updates process for issuance of partial food packages. (§3.1)
 - Updates situations in which benefits may be issued over the phone. (§4.0)
 - Deletes requirement for local agencies to have local policies regarding:
 - issuance of food benefits over the phone
 - single or double issuance of benefits
- ◆ **610 – Required Proofs – Identity, Residency, Income** (*released pending USDA review*)
 - Updates related to proof of identity, confirmation of identity in some situations and the eWIC card.
 - eWIC language changes.

- ◆ **611 – Income Eligibility: Determining Income Eligibility** (*released pending USDA review*)
 - Includes the requirement to view 30 days of proof of income, situations where annual income should be used, and how to determine income eligibility for households experiencing a layoff or strike. (For more information see Part 3 of the June “Mixed Basket” in-service).
 - Revises Flow Chart for Determining Income Eligibility. (Appendix A)

- ◆ **613 – Income Eligibility: What Counts As Income** (*released pending USDA review*)
 - Includes eWIC updates and 30 days of proof of income requirement.

- ◆ **615 – Income Eligibility: Change in Income** (*released pending USDA review*)
 - Includes eWIC updates.

- ◆ **616 – Unavailable Proofs**
 - Includes the requirement to complete the “No Proof Form” for eligibility pending. (For more information see “Operation Clean-up” in-service November 2015.)
 - Includes how to review proofs electronically. (For more information see Part 3 of the June 2016 “Mixed Basket” in-service.)

- ◆ **621 – Providing WIC Services During Home Visits**
 - Specifies that issuance of eWIC cards for the first and second cardholder must be provided in person.

- ◆ **652 – WIC Transfer Card and WIC Overseas Program**
 - eWIC language changes.
 - Updates contact information for TRICARE.

- ◆ **823 – Nutrition Education: Second Nutrition Education Using Online Lessons**
 - Updates the procedure for offering online nutrition education to reflect addition of new online systems.
 - Updates participant eligibility standards for online nutrition education.
 - Updates options and instructions for reporting and documenting online lesson completion.
 - Adds requirement that staff members involved in verifying online second nutrition education contacts receive training on how to do so.
 - Updates requirements for local agency procedure and approval process.
 - Adds link to Oregon WIC Nutrition Education Guidance.

- ◆ **835 – Nutrition Education: Attendance or Refusal**
 - eWIC language and procedure changes.
 - Adds PPM references.

INSTRUCTIONS FOR UPDATING HARD COPY MANUALS:

Remove page(s)	Insert page(s)	Implementation date	Issue date
140.0 – 140.3	140.0 – 140.3	June 1, 2016	June 1, 2016
400.0 – 400.3	400.0 – 400.3	June 1, 2016	June 1, 2016
435.0 – 435.6	435.0 – 435.3	June 1, 2016	June 1, 2016
440.0 – 440.12	440.0 – 440.12	June 1, 2016	June 1, 2016
511e.0 – 511e.4	511.0 – 511.4	June 1, 2016	June 1, 2016
610.0 – 610.8	610.0 – 610.8	July 1, 2016	June 1, 2016
611.0 – 611.13	611.0 – 611.12	July 1, 2016	June 1, 2016
613.0 – 613.10	613.0 – 613.12	July 1, 2016	June 1, 2016
615.0 – 615.2	615.0 – 615.4	July 1, 2016	June 1, 2016
616.0 – 616.7	616.0 – 616.5	July 1, 2016	June 1, 2016
621.0 – 621.3 <i>and</i> 621e.0 – 621e.3	621.0 – 621.3	June 1, 2016	June 1, 2016
652.0 – 652.7	652.0 – 652.7	June 1, 2016	June 1, 2016
823.0 – 823.1 <i>and</i> 823e.0 – 823e.2	823.0 – 823.2	June 1, 2016	June 1, 2016
835.0 – 835.1	835.0 – 835.1	June 1, 2016	June 1, 2016

NOTE:

- WIC policies can be viewed online at <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/wicpolicy.aspx>.
- Make sure all hard copies of the WIC Policy and Procedure Manual are updated.
- See the next page for all WIC policy updates for the current year.
- Call the state WIC office at **971-673-0040** if you need additional hard copies of a policy update.

WIC Policy Updates Issued for 2016 (Year-To-Date)

Manual Update Number	Policy Number	Policy Title	Manual Page Number(s)	Issue Date
2016-01	710	Breastfeeding: Definition, Promotion and Support Standards	710.0 – 710.9	January 11, 2016
2016-01	712	Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines	712.0 – 712.12	January 11, 2016
2016-01	713	Breastfeeding: Use of Supplemental Formula	713.0 – 713.4	January 11, 2016
2016-01	716	Breastfeeding Peer Counseling (BFPC) Program Requirements	716.0 – 716.10	January 11, 2016
2016-01	730	Bid Formula: Use and Description	730.0 – 730.5	January 11, 2016
2016-01	880	Referrals: Alcohol, Tobacco and Other Drug Use	880.0 – 880.2	January 11, 2016
2016-01	885	Other Referrals: Required and Recommended	885.0 – 885.3	January 11, 2016
2016-01	711	<i>Merged into policy 710 and DELETED -</i> Breastfeeding: Benefits and Contraindications	---	January 11, 2016
2016-02	452	Civil Rights	452.0 – 452.12	March 8, 2016
2016-02	710	Breastfeeding: Promotion and Support Standards	710.8 – 710.9	March 8, 2016
2016-02	717	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Personnel Guidelines	---	March 8, 2016
2016-02	718	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Job Parameters, Protocol and Scope of Practice	---	March 8, 2016
2016-02	719	<i>Merged into policy 716 and DELETED –</i> Breastfeeding Peer Counseling: Training	---	March 8, 2016
2016-03	480	Voter Registration-National Voter Registration Act	480.0 – 480.9	April 14, 2016
2016-03	511e	Food Benefit Issuance	511e.0 – 511e.4	April 14, 2016
2016-03	561e	Program Integrity: Replacement of Food Benefits	561e.0 – 561e.2	April 14, 2016
2016-03	614	Income Eligibility: Current Income Guidelines	614.0 – 614.2	April 14, 2016
2016-03	1100	Farm Direct Nutrition Program: Local Program Responsibilities	1100.0 – 1100.7	April 14, 2016
2016-04	140	Organization: Purpose and Chart	140.0 – 140.3	June 1, 2016
2016-04	400	Local Program Overview: Responsibilities and Communications	400.0 – 400.3	June 1, 2016
2016-04	435	Staffing Recommendations	435.0 – 435.3	June 1, 2016
2016-04	440	Staff Training Requirements	440.0 – 440.12	June 1, 2016

**WIC Policy Updates Issued for 2016
(Year-To-Date)**

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2016-04	511	Food Benefit Issuance	511.0 – 511.4	June 1, 2016
2016-04	610	Required Proofs-Identity, Residency, Income	610.0 – 610.8	June 1, 2016
2016-04	611	Income Eligibility: Determining Income Eligibility	611.0 – 611.12	June 1, 2016
2016-04	613	Income Eligibility: What Counts as Income	613.0 – 613.12	June 1, 2016
2016-04	615	Income Eligibility: Change in Income	615.0 – 615.4	June 1, 2016
2016-04	616	Unavailable Proofs	616.0 – 616.5	June 1, 2016
2016-04	621	Providing WIC Services During Home Visits	621.0 – 621.3	June 1, 2016
2016-04	652	WIC Transfer Card and WIC Overseas Program	652.0 – 652.7	June 1, 2016
2016-04	823	Nutrition Education: Second Nutrition Education Using Online Lessons	823.0 – 823.2	June 1, 2016
2016-04	835	Nutrition Education: Attendance or Refusal	835.0 – 835.1	June 1, 2016



SECTION: Introduction & Overview
SUBJECT: **ORGANIZATION: PURPOSE & CHART**
DATE: June 1, 2016 (*revised*)

140

- PURPOSE:** To describe the mission and administration of the Nutrition and Health Screening (WIC) Program.
- APPENDICES:** Appendix A 140.2 Agency and Function Chart
Appendix B 140.3 Oregon WIC Program Mission Statement
- BACKGROUND:**
- 1.0 The special Supplemental Food Program for Women, Infants and Children (commonly known as WIC) was established by the Federal Government in 1972 as a pilot program. At that time, Public Law 92-433 extended WIC to some half million pregnant women and infants in low-income areas for the first time. The Oregon WIC Program opened its first five projects, and served 5,000 participants in 1974. In 1975 WIC was made a permanent program and in 2014 provided WIC nutrition services to approximately 8.3 million individuals throughout the United States.
- 2.0 The WIC Program is a federally funded nutrition education food supplement program for low income, pregnant, postpartum, breastfeeding women and children under five years of age who are at nutritional risk.
- Administration of program* 3.0 In Oregon the WIC Program is part of the Nutrition & Health Screening Section in the Oregon Public Health Division and is administered by the Oregon Health Authority. See Appendix A, Agency and Function Chart, for an explanation of the agencies involved in administering the program, starting with U.S. Congress on a national level to regional, state and local levels.
- 4.0 The overall purpose of the WIC Program is to ensure that Oregon families have the resources and knowledge to achieve optimal nutrition and lifelong health through the provision of premier public health nutrition services.
- Mission statement* 5.0 In the fall of 2011, the Oregon WIC Program updated its program Mission Statement. See Appendix B for this Mission Statement.
- Program services* 6.0 The program provides the following services to accomplish this goal:
- **participant-centered nutrition education** to relate good nutrition to their health and dietary habits;

ORGANIZATIONAL: Purpose & Chart, cont.

- **breastfeeding promotion and support**
- **screening** for anemia, poor growth patterns, inadequate diet, and other nutrition problems and needs;
- **monthly benefits used to purchase nutritious foods** to prevent or improve nutrition-related medical problems; and
- **referrals** to other health or social services. ★

- REFERENCES:**
1. National WIC Association web page: <http://www.nwica.org>
 2. US Department of Agriculture, Food and Nutrition Services, WIC Program Data page: <http://www.fns.usda.gov/pd/wicmain.htm>

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Agency and Function Chart

U.S. Congress

Creates the law authorizing the WIC Program and appropriating funds. WIC must be reauthorized every five years as part of the Child Nutrition Programs reauthorization.

U.S. Department of Agriculture, Food and Nutrition Service

Administers national WIC program, including development of funding formula and issuance of rules and regulations.

Western Regional USDA-FNS Office (San Francisco)

Provides state contact with USDA. Reviews state and local agencies in the Western Region.

Oregon Health Authority, Public Health Division, State WIC Office

Provides contracts with county health departments, tribes and non-profits. Provides fiscal management. Develops State Plan of Operation and Procedure Manual. Provides consultation and training to local agencies and reviews program operations biennially. Manages vendor contracts and ensures program integrity. Provides data system development and support.

Local WIC Program

Develops the local WIC budget and Nutrition Education Plan. Determines eligibility and provides services to eligible participants.

Oregon Women, Infants and Children Program (WIC)

Vision: Oregon families have the resources and knowledge to achieve optimal nutrition and lifelong health.

Mission: Assure the provision of premier public health nutrition services by providing leadership, guidance and resources to local WIC programs, vendors and partners.



SECTION: Local Program Operations 400
SUBJECT: LOCAL PROGRAM OVERVIEW:
RESPONSIBILITIES & COMMUNICATIONS
DATE: June 1, 2016 (*Revised*)

POLICY: Local programs shall comply with the WIC Program Elements as written by the Oregon Health Authority, Public Health Division in the Financial Assistance Contract and shall notify the state WIC office of program changes and issues requiring state program approval.

PURPOSE: To clarify the responsibilities of the local program and to ensure compliance with USDA and state rules and regulations for local program operation.

RELEVANT REGULATIONS: 7 CFR §246.6 Agreements with local programs
7 CFR §246.8 ¶ (a) —Civil rights requirements

7 CFR §246.25—Records and Reports
ORS 433.835-433.990 – Oregon’s Smokefree Workplace Law
FFY 1994 Agriculture, Rural Development, Food & Drug Administration, and Related Agency Appropriations Act (Public Law 103-111)
FNS Instruction 113-2 (Rev.-1)

OREGON WIC PPM REFERENCES: ♦215—Local Program Monitoring and Review
♦310—Annual Plan/Contract Payment Process for Local Programs
♦325—Caseload Management
♦420—Approval Process for Local Program Policies and Procedures
♦440—Staff Training Requirements
♦452—Civil Rights
♦470—Local Program Outreach
♦590—Program Integrity: Participant Violations
♦652—WIC Transfer Card and WIC Overseas Program
♦660—Competent Professional Authority: Requirements
♦670—Overview of Risk Criteria and Priorities
♦820—Nutrition Education: Participant Contacts

DEFINITIONS: *WIC Program Elements* Services WIC Programs agree to provide based on a contract with the Oregon Health Authority, Public Health Division.

PROCEDURE:

WIC Program Elements 1.0 The local program has agreed to comply with the Oregon Health Authority, Public Health Division WIC Program Elements in accepting USDA federal funds. See ♦310—Annual Plan/Contract Payment Process for Local Programs.

A complete list of WIC Program Elements can be found at <http://public.health.oregon.gov/ProviderPartnerResources/LocalHealthDepartmentResources/Pages/program-elements.aspx>

LOCAL PROGRAM OVERVIEW: RESPONSIBILITIES & COMMUNICATIONS, *cont.*

- WIC Policy and Procedure Manual*** 2.0 The local program shall comply with all minimums stated in this manual. Terms used in this manual to indicate state and federal requirements are “will,” “shall,” and “must.”
- If unable to provide required services*** 3.0 If a designated local program cannot provide some or all of the health services needed to determine nutritional risk for WIC or other WIC administrative services, the local program must contract or enter into a written agreement with a health facility/clinic to perform some or all of these services. Notify the state WIC office if you are considering this option.
- EXAMPLE:** If a WIC clinic does not conduct a blood test screen for anemia, height or weight measurements, or any additional assessments necessary to determine the existence of medical and dietary risks, the WIC program is required to have a written agreement with a health entity as described above.
- Oregon’s Smokefree Workplace Law*** 4.0 To be eligible to receive WIC administrative funds, local agencies must comply with ORS 433.835-433.990 Oregon’s Smokefree Workplace Law.
- Issues requiring state notification*** 5.0 Local programs will notify the state WIC program of issues requiring state approval and program changes affecting communications between the agencies and/or uniform delivery of services.
- 5.1 Notify the state WIC program and update the TWIST data system immediately with any changes in:
- program mailing address (for correspondence or shipments)
 - program telephone/fax numbers
 - program personnel involving management, program coordinator, or nutrition professional/health professional
 - TWIST special user designee.
- 5.2 Notify your state WIC program nutrition consultant concerning the following items or issues. See ♦325—Caseload Management.
- 5.2.1 Opening a new WIC clinic or closing an existing clinic.
- 5.2.2 Requests for changes in local program operations, such as caseload allocation or geographic service area.
- 5.2.3 Notify your nutrition consultant **before** making any changes in priorities served or starting a waiting list.

LOCAL PROGRAM OVERVIEW: RESPONSIBILITIES & COMMUNICATIONS, cont.

(Issues requiring state notification:)

- 5.3 Notify the state WIC program compliance coordinator concerning the following items or issues. See ♦590—Program Integrity: Participant Violations.
 - 5.3.1 Participant requests for fair hearings.
 - 5.3.2 Participant program abuse cases where the sanction is possible program suspension.
 - 5.3.3 Situations where theft of eWIC card stock, or WIC computer hardware (such as WIC laptops, aircards, or document printers) is suspected.
 - 5.3.4 Situations where unauthorized use of the TWIST data system is suspected.
 - 5.3.5 Suspected fraud or abuse by a staff member.
- 5.4 Notify the state WIC program manager regarding plans for major changes in the local program’s data system.
- 5.5 Notify the state WIC civil rights representative about any complaints of discrimination. See ♦452—Civil Rights.

Materials requiring state approval

- 6.0 Submit policies and procedures requiring state WIC program approval to your state WIC program nutrition consultant **before implementation** as described in ♦420—Approval Process for Local Program Policies and Procedures.
- 7.0 Submit to your state WIC program nutrition consultant for approval any locally produced forms (either new or revised) that would replace the state forms listed below in ¶7.1. These forms were selected because they include information on documentation required by USDA regulation. The local program must submit a draft of the locally produced form(s) to the assigned state WIC program nutrition consultant to request approval **before implementation**.
 - 7.1 When the state forms listed below are revised, the local program must revise locally produced materials to reflect these changes and resubmit the form(s) to the state WIC program for approval. Local programs have 60 days from receipt of the revised state form(s) to submit revisions of the locally produced form(s) for approval.
 - Oregon WIC Employee Signature Form (form 57-200)
 - WIC Customer Complaint Data Entry Document (form 57-500)
 - Notice of WIC Ineligibility (form 57-607)
 - Notice of Change in WIC Benefits (form 57-608)
 - Certification Data Entry Document (form 57-615)
 - Health Questionnaire: Infants/ Children (form 57-617)
 - Health Questionnaire: Pregnant Women (form 57-618)
 - Health Questionnaire: Postpartum Women (form 57-619)
 - Your Baby’s Diet Questions (form 57-622)
 - Your Child’s Diet Questions (form 57-624)

LOCAL PROGRAM OVERVIEW: RESPONSIBILITIES & COMMUNICATIONS, cont.

(Materials requiring state approval)

- Your Diet Questions (form 57-626)
- Participant Signature (form 57-629)
- Rights and Responsibilities (form 57-630)
- What Proof to Bring to WIC (form 57-632)
- No Proof Form (form 57-633)

Records for state program review

- 8.0 Maintain on file at the local program the following records for review by the state WIC program:
- 8.1 Current list of staff approved as certified professional authorities (CPA). See ♦660—Competent Professional Authority: Requirements.
- 8.2 WIC Transfer Card (VOC) Log or comparable TWIST reports documenting card issuance. See ♦652—WIC Transfer Card and WIC Overseas Program.
- 8.3 Local WIC policies and procedures. See ♦420—Approval Process for Local Agency Policy and Procedures
- 8.4 WIC Training Module completion forms for local program WIC staff. See ♦440—Staff Training Requirements
- 8.5 Documentation of completed local program self-evaluations. See ♦215—Local Program Monitoring and Review.
- 8.6 Copies of any written agreements or contracts your program has with other programs for providing WIC-related services. For example:
- Nutrition education provided by non-WIC staff
 - WIC breast pump issuance by partners
 - Lactation services
 - Outreach and referral
- 8.7 Written log of outreach activities. See ♦470—Local Program Outreach.
- 8.8 Local program nutrition education class lesson plans and learning objectives. See ♦820—Nutrition Education: Participant Contacts.
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POLICY: Local WIC programs are required to have specific staff to carry out identified program functions and roles.

PURPOSE: To ensure that local agencies are able to meet all program requirements and functions defined by federal regulations and state policy.

RELEVANT REGULATIONS: CFR 246.11 c (7) (ii)

- OREGON WIC PPM REFERENCES:**
- ◆400—Local Program Overview: Responsibilities and Communication
 - ◆440—Staff Training Requirements
 - ◆660—Competent Professional Authority: Requirements
 - ◆661—Competent Professional Authority/High-Risk Counseling
 - ◆710—Breastfeeding: Definition, Promotion and Support Standards
 - ◆712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines
 - ◆716—Breastfeeding Peer Counseling: State and Local Program Responsibilities
 - ◆717—Breastfeeding Peer Counseling: Peer Counselor Qualifications
 - ◆718—Breastfeeding Peer Counseling: Job Parameters, Protocol and Scope of Practice

REFERENCES: 2013 Nutrition Services Standards

DEFINITIONS:	<p><i>Breastfeeding Coordinator</i> A designated staff member who provides leadership to the local WIC agency regarding breastfeeding promotion, education and support.</p> <p><i>Breastfeeding Peer Counselor</i> A paraprofessional support person who provides basic breastfeeding information and encouragement to WIC pregnant and breastfeeding mothers. She is a mother who is breastfeeding or has breastfed, and she reflects the population served in age, ethnicity, education and language.</p> <p><i>Breastfeeding Peer Counselor Coordinator</i> This person mentors and coaches the breastfeeding peer counselors and coordinates the breastfeeding peer counseling program on a local program level.</p> <p><i>Competent Professional Authority</i> An individual on the staff of the local agency authorized to assess program eligibility, determine nutrition risk and prescribe supplemental foods.</p> <p><i>Training Supervisor</i> A person designated by the local program to ensure training of local staff is completed in accordance with state policy.</p>
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STAFFING REQUIREMENTS, *cont.*

<i>WIC Coordinator</i>	An individual on the staff of the local agency designated by the agency administrator to act as the local WIC program representative with the state WIC program and partner organizations.
<i>WIC Nutritionist</i>	A nutrition professional working in WIC who meets one or more of the following qualifications: a Master's Degree in nutrition; a Registered Dietitian (RD/RDN) with the Academy of Nutrition and Dietetics, or eligible for RD/RDN registration; an Oregon Licensed Dietitian (LD).

PROCEDURE:

Staffing Requirements

- 1.0 Local WIC programs are required to have staff who are qualified and trained in the following positions to ensure the local program meets all state and federal regulations, and that all participants receive appropriate nutrition services, including breastfeeding promotion, education and support:
 - 1.1 **Competent Professional Authority (CPA):** Commonly referred to as certifiers, local agencies must have adequate CPA's to provide services for the agency's assigned caseload. See [◆660—Competent Professional Authority: Requirements](#) for qualifications and competencies.
 - 1.2 **WIC Nutritionist:** Each local agency must have access to adequate nutritionist time to provide high risk services for the agency's assigned caseload. See [◆661—Competent Professional Authority/High-Risk Counseling](#) for qualifications and a description of required high risk services.
 - 1.2.1 Nutritionist competencies are available on the Training Supervisors web page, <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/training-supervisor.aspx>
 - 1.3 **WIC Coordinator:** Each agency must have one staff member designated as filling this role. See ¶2.0 for details.
 - 1.3.1 Coordinator competencies and descriptions of their duties are available on the Training Supervisors web page.
 - 1.4 **Breastfeeding Coordinator:** Each agency must have one staff person designated as filling this role. See [◆710—Breastfeeding: Definition, Promotion and Support Standards](#) for more information.
 - 1.4.1 A role description is available on the Training Supervisors web page

STAFFING REQUIREMENTS, cont.

- 1.4.2 [◆712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines](#) indicate that an additional staff person can be designated to act as Breast Pump Coordinator.
- 1.5 **Training Supervisor:** Each agency must have one staff person designated as filling this role. See [◆440—Staff Training Requirements](#) for required qualifications and a description of roles and responsibilities.
 - 1.5.1 Resources to support the training supervisor are available on the Training Supervisors web page.
- 1.6 **Breastfeeding Peer Counseling Coordinator:** Those agencies with the Breastfeeding Peer Counseling Program must have one staff person designated to fill this role. See [◆716—Breastfeeding Peer Counseling: State and Local Program Responsibilities](#) for required qualifications and a description of roles and responsibilities.
- 1.7 **Breastfeeding Peer Counselor:** Those agencies with the Breastfeeding Peer Counseling Program must have adequate peer counselors to provide services for the agency’s assigned peer counseling caseload. See [◆716—Breastfeeding Peer Counseling \(BFPC\) Program Requirements](#) for required qualifications and a description of roles and responsibilities.
- 2.0 The WIC Coordinator is the person responsible for ensuring that the local agency follows federal regulations and state policies, and meets expected program outcomes. Because of this pivotal role, it is highly recommended that the WIC Coordinator be a health professional as defined in [◆660—Competent Professional Authority: Requirements](#).
 - 2.1 WIC Coordinators fill the following leadership roles in their agency:
 - Primary contact between the state WIC program and the local agency
 - Program management and oversight
 - WIC program
 - Nutrition education activities
 - Annual Nutrition Services Plan
 - Breastfeeding support and promotion
 - Benefit distribution
 - Farm Direct Nutrition Program
 - Benefit distribution
 - Reporting
 - Breastfeeding Peer Counseling (when applicable)
 - Satellite clinics
 - Caseload management
 - Program integrity and compliance

STAFFING REQUIREMENTS, cont.

- Supervision of clinic – scheduling/COORDINATING
 - Develop outreach strategies and oversee outreach efforts
 - Network with community organizations and partners
 - Training – staff development
 - Policy/protocol development
 - Primary point of contact for WIC Biennial Review process
 - Assure adequate facilities, resources, data system access and equipment for service delivery
- 2.2 WIC Coordinators may also fill the following leadership roles in their agency:
- Supervision of staff (including hiring and firing)
 - Administrative budgeting
- 3.0 Agencies may designate other staff positions as necessary to support local program functions. These may include (but are not limited to) clerical staff, or staff who perform lab functions.
- 4.0 All WIC staff are required to complete certain training in order to perform the functions of their designated roles. See [◆440—Staff Training Requirements](#) for details on staff training.
- 5.0 Staffing needs may vary depending on the number of participants served by the local program, the structure of the agency, and local decisions made about clinic operations. Due to this wide range of variations, the 2006 *WIC Staffing Data Collection Project* found that there is no single ideal staffing pattern or staff-to-participant ratio recommendation. Agencies may work with their state nutrition consultant to determine optimal staffing given their unique circumstances. ★

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SECTION: Local Program Operations
SUBJECT: Staff Training Requirements
DATE: June 1, 2016 (*revised*)

440

POLICY: Local programs will ensure that staff are appropriately trained to perform their functions according to policy. Local program staff shall complete state training modules or online courses as appropriate for their position. Local program staff must demonstrate an adequate level of competence in performing their tasks.

PURPOSE: To train WIC staff to be Competent Professional Authorities (CPAs) as required by USDA. To ensure a consistent level of competence among all local WIC staff.

RELEVANT REGULATIONS:
 7 CFR §246.11 ¶(c)(2)—Provision of training
 7 CFR §246.11 ¶(c)(7)(iii)—New staff training
 7 CFR §246.7 ¶(e)—Certification of participants: Nutritional risk
 7 CFR §246.14 ¶(c)(iii) —Allowable Training Costs
 USDA WIC Nutrition Services Standards—Standard 3 (A)(1)(a-e)

OREGON WIC PPM REFERENCES:
 ◆425—Ordering State Produced Materials
 ◆426—Record Retention
 ◆452—Civil Rights
 ◆660—Competent Professional Authority: Requirements
 ◆710—Breastfeeding: Promotion and Support Standards
 ◆719—Breastfeeding Peer Counseling: Training
 ◆850—Nutrition Education Plan

APPENDICES:
 440.7 Appendix A WIC Training Module Schedule
 440.13 Appendix B WIC Training Supervisor Roles and Responsibilities
 440.15 Appendix C Sample Training Calendar for Full Time CPA
 440.18 Appendix D Staff Training Tracking Sample
 440.20 Appendix E CPA Training Checklist

DEFINITIONS:

Training module Training modules are self-paced pen and paper instructional modules, produced by the state WIC program to guide training at the local level on topics pertinent to the WIC program.

Online courses Online courses are self-paced training courses produced by the state WIC program, hosted on a central site accessed via the internet, and completed by local agency staff using a computer. Select courses train local staff on topics pertinent to the WIC program.

Local program training supervisor A person designated by the local program to ensure training of local staff is completed in accordance with state policy. Minimum qualifications: must be a health professional as defined in ◆660—Competent Professional Authority: Requirements.

STAFF TRAINING REQUIREMENTS, cont.

<i>Trainee</i>	The local program staff receiving training using the training modules and online courses.
<i>Level 1 Training</i>	Training modules, module chapters or lessons, or online courses that must be completed by all WIC staff.
<i>Level 2 Training</i>	Training modules, module chapters or lessons, or online courses that must be completed by all CPAs.
<i>Level 3 Training</i>	Advanced training, online courses or modules, module chapters or lessons that are completed by staff with previous advanced training in a specific content area.

BACKGROUND: The Oregon WIC program considers well-trained staff an asset to local WIC programs. Local programs employ a variety of staff in WIC with diverse backgrounds and training. Local programs must ensure that all WIC staff are trained and have the basic nutrition knowledge and skills needed to provide WIC services to participants using a participant-centered approach.

PROCEDURE:

- Training requirements for new WIC staff*
- 1.0 Local program staff working in the WIC program must complete the appropriate training and Oregon WIC Training Modules or online courses for their position within a specified time period. See Appendix A—WIC Training Module Schedule for more information.
 - 1.1 All staff performing WIC functions, including integrated clerical staff, must complete required WIC training regardless of the funding source for the position.
 - 1.2 Staff who are cross trained to perform more than one role (e.g. clerk and CPA) must complete the training requirements for all the roles they are assigned.
- Ordering training materials*
- 2.0 Hard copies of paper and pen WIC training modules, and training supervisor guides are available to order through the state mailroom. See ♦425—Ordering State Produced Materials for more information.
 - 2.1 Modules are also available to download electronically from the state WIC website at <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/modules.aspx>.
 - 2.2 Online courses are accessed through the state DHS/OHA Learning Center. See <http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/modules.aspx> for more information.

STAFF TRAINING REQUIREMENTS, cont.

- Training Supervisors Guides**
- 3.0 There is a training supervisor’s guide for each module or online course.
- 3.1 Most online courses share a single training supervisor’s guide. The “*WIC Participant Centered Education*” online course has its own training supervisors guide.
- Level I training: all WIC staff**
- 4.0 All staff working in WIC in any job classification must at a minimum complete the following training within one month of hire (See Appendix A for details):
- “*Introduction to WIC*” module
 - “*Breastfeeding Level 1*” online course
 - “*Food Package*” module (See 7.1 for exceptions)
 - Civil Rights training as defined in ♦452—Civil Rights
- 4.1 All staff working in WIC in any job classification must complete the following training within 3 months of hire (See Appendix A for details).
- “*PCS – Setting the Stage*” online course
- Level II training: CPAs**
- 5.0 In addition to the modules or courses required for all WIC staff, staff hired as certifiers (Competent Professional Authority/CPAs as defined in ♦660—Competent Professional Authority: Requirements), must complete the following training (see Appendix A for details):
- “*Anthropometrics*” online course (within 1 month of hire and prior to performing these functions)
 - “*Hematology*” online course (within 1 month of hire and prior to performing these functions)
 - “*Dietary Risk*” module (prior to beginning to certify)
 - “*Nutrition Risk*” module (prior to beginning to certify complete the appropriate workbooks for the category of participant to be certified)
 - “*WIC Participant Centered Education*” online course (10 individual modules) (within 3 months of beginning to certify)
 - “*Basic Nutrition*” online course (within 3 months of beginning to certify)
 - “*Prenatal Nutrition*” online course (prior to certifying pregnant women and within 6 months of beginning to certify)
 - “*Child Nutrition*” online course (prior to certifying children and within 6 months of beginning to certify)
 - “*Infant Feeding and Nutrition*” module (prior to certifying infants and within 6 months of beginning to certify)
 - “*Breastfeeding Level 2*” module or “Breastfeeding Level 2” face-to-face training (prior to certifying breastfeeding women and within 6 months of beginning to certify,
 - “*Infant Formula*” module (within 6 months of beginning to certify)

STAFF TRAINING REQUIREMENTS, cont.

***(Level II training:
CPAs)***

- “*Postpartum Nutrition*” online course (prior to certifying non-breastfeeding postpartum women and within 6 months of beginning to certify)
- “*Baby Behaviors*” online course (with 6 months of beginning to certify)

5.1 WIC staff serving in the roles of WIC registered dietitian/nutritionist or training supervisor must complete the training to be a CPA.

Facilitating groups

5.2 CPA’s providing group nutrition education must complete the following module prior to facilitating any groups:

- “*Providing Participant Centered Groups*” module

***Staff performing
lab functions***

6.0 WIC staff whose jobs are limited to weighing and measuring or drawing blood must complete training appropriate for all staff listed in ¶4.0 plus the “*Anthropometrics*” and “*Hematology*” online courses. (See Appendix A for details.)

***Breastfeeding
peer counselors***

7.0 WIC staff whose jobs are limited to breastfeeding peer counseling must complete training appropriate for all staff listed in ¶4.0 and the following modules. (See Appendix A and ♦719—Breastfeeding Peer Counseling: Training for details.)

- “*Breastfeeding Level 2*” module or “*Breastfeeding Level 2*” face-to-face training
- “*WIC Participant Centered Education*” online course
- “*Baby Behaviors*” online course

7.1 Staff who work 100% of their time as breastfeeding peer counselors are not required to complete the “*Food Package*” module.

***Quarterly
in-services***

8.0 Certifying staff must, at a minimum, participate in quarterly in-services on topics related to certifier competencies. (See the Certifier Competency Model included as an appendix to ♦660—Competent Professional Authority: Requirements.)

8.1 In-service topics must develop staff knowledge, skills or abilities related to CPA competencies identified in the CPA competency model. Examples include: facilitated discussions relating to participant centered services, new WIC mandates or TWIST functionality; attending the WIC statewide meetings; guest speakers on customer service, cultural competence, or nutrition topics; presentations by partner or referral agencies; facilitated discussions about nutrition risks or topics by the WIC nutritionist.

STAFF TRAINING REQUIREMENTS, cont.

- Annual civil rights training*
- 8.2 It is recommended that selection of quarterly in-service topics either be based on staff training needs identified during local program self-evaluations, or local WIC program needs; or be chosen to further enhance staff skills and job satisfaction.
 - 8.3 The required annual civil rights training can be considered one of the quarterly in-services (See ♦452—Civil Rights for more information).
 - 8.4 Locally mandated trainings that are not related to certifier competencies, such as HIPAA or blood borne pathogens, cannot be counted as meeting the quarterly WIC in-service requirement.
 - 8.5 Local program plans for quarterly in-services will be reported as part of the annual nutrition services plan (see ♦850—Nutrition Services Plan) and documentation of in-service topics and attendance kept on file to be reviewed at biennial Local Agency Review.
 - 8.6 See Appendix D for a sample training tracking document.
- Selection of training supervisors*
- 9.0 Each local WIC program will identify a training supervisor.
 - 9.1 The state WIC program recommends that the training supervisor be a registered dietitian (RD), although at a minimum the training supervisor must be a health professional as defined in ♦660—Competent Professional Authority: Requirements. The goal is to ensure that the training supervisor not only understands the WIC training modules but can also answer questions beyond the scope of the modules. The training supervisor acts as a resource for accurate information to CPA’s in the program.
 - 9.2 The title of “training supervisor” indicates oversight of training and does not need to be a person in a supervisory or management position.
 - 9.3 The local WIC program may assign more than one person to share this role. Specific duties or responsibilities may be delegated to other staff and overseen by the training supervisor.
 - 9.4 The local WIC coordinator shall submit the name and qualifications of the training supervisor(s) annually in the nutrition education plan (see ♦850—Nutrition Education Plan).
- Training of training supervisors*
- 10.0 The training supervisor will receive an orientation to the training supervisor’s role and responsibilities from their local WIC coordinator or from the state WIC training coordinator.

STAFF TRAINING REQUIREMENTS, cont.

(Training of training supervisors)

- 10.1 The training supervisor must be a CPA. That means any Level 2 training modules or online course they have not already completed must be completed. This includes:
- reading the module or completing the online courses;
 - working through the practice activities and skill checks in the module or online course;
 - passing the post-test;
 - being observed; and
 - completing the evaluation of the module.
- 10.2 The training supervisor must complete new modules or online courses before training other staff on that module.

Responsibilities of training supervisor

- 11.0 The training supervisor is responsible for ensuring local staff are trained in a timely manner and in compliance with policy. If the training supervisor is not the WIC Coordinator or staff supervisor, they will need to work closely with the WIC Coordinator or staff supervisor to develop appropriate training plans for staff. The training supervisor can designate another health professional to train another staff member.
- 11.1 See Appendix B for a sample description of the roles and responsibilities of a WIC training supervisor.

Training supervisor tasks

- 12.0 The training supervisor will work with the trainee's supervisor to develop a training plan. See Appendix C for an example of a training time line or plan for a CPA and Appendix E for a CPA training checklist. The training supervisor shall:
- 12.1 Initiate training by scheduling time for the trainee to complete each module or online course and the activities involved.
- 12.2 Use the training supervisor's guide that accompanies each module or online course for directions on training with that module.
- 12.3 Assure that the trainee reads the modules or completes the online courses and completes all activities, practice activities, or skill checks for each module.
- 12.4 Do the specified observations for all trainees and document them as indicated in the module instructor's manual or training supervisor's guide. Role playing may be used as needed.
- 12.5 Assure that the trainee completes the post-test with at least 90 percent of the questions answered correctly, unless specifically stated as 100 percent in the training supervisor's guide.

Standard of competency: minimum 90% score on post-test

STAFF TRAINING REQUIREMENTS, cont.

12.5.1 If the score is not 90 percent, the training supervisor must take action to ensure that the trainee knows the material.

Options include:

- Having the trainee re-read the sections of the module or review the sections of the online course that contain the information missed on the post-test and then retake the missed questions until all are answered correctly.
- Having the trainee demonstrate to the training supervisor's satisfaction that she/he knows the material.

12.5.2 If a substantial number (approximately one-third or more) of the post-test questions are answered incorrectly, either have the trainee retake the module/course from the beginning, or have the trainee re-read the pertinent sections, complete the necessary progress checks again, and retake the missed questions.

“Testing out” of modules

- 12.6 If the trainee is a health professional or has two or more years of WIC experience from another state, the training supervisor, at his/her discretion, may have the trainee take the post-test without reading the module and doing the module activities, or without completing the online course. If the trainee passes the post-test with 90 percent correct answers, the training supervisor may complete the competency achievement checklist and consider the trainee competent in that module area. If they do not pass with 90 percent correct, the training supervisor shall instruct the trainee as to which sections of the module need to be completed.
- 12.7 The training supervisor will instruct the trainee to complete the *“Module Evaluation Form”* for each module.
- 12.8 File a copy of the graded post-test or a copy of the Certificate from the Learning Center and the *“Competency Achievement Checklist”* in an appropriate place for each trainee after completion of the module.
- 12.9 The training supervisor will enter the module/course completion date into the TWIST data system in the *“Operations and Management”* module within a month of module or course completion.
- 12.10 The training supervisor may provide the trainee with a certificate of completion. Sample certificates of completion can be found on the Oregon WIC website. ★

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WIC Training Supervisor's Guides

Order # (57-#)	Module or Course Name	Print or Publish Date
6623	Introduction to WIC Module Training Supervisors Guide	2015
6603	Dietary Risk Module Training Supervisor's Guide	2015
6609	Online Courses Training Supervisor's Guide	2014
6631	WIC Participant Centered Education Online Course Training Supervisor's Guide	2010
6635	Nutrition Risk Module Training Supervisor's Guide	2015
6637	Food Package Module Training Supervisor's Guide	2015
6615	Breastfeeding Level 2 Module Training Supervisor's Guide	2004
6625	Infant Feeding and Nutrition Module Training Supervisor's Guide	2014
6627	Infant Formula Module Training Supervisors Guide	2014
6620	Providing Participant Centered Groups Module Training Supervisors Guide	2013

WIC Training Modules or Courses to be completed by: All WIC Staff

Order # (57-#)	Module or Course Name	Print or Publish Date	New hire complete within # months	Level (1=all staff)	Estimated time needed to complete (hours)
6622	Introduction to WIC Module	2015	0.25	1	2 - 5
6636	Food Package Module	2015	1	1	2.5 - 5
	Breastfeeding Level 1 Online Course	2013	1	1	1.5
	PCS – Setting the Stage Online Course	2014	3	1	1.5

WIC Training Modules or Courses to be completed by: WIC Breastfeeding Peer Counselors

Order # (57-#)	Module or Course Name	Print or Publish Date	New hire complete within # months	Level (1=all staff, 2=CPA)	Estimated time needed to complete (hours)	Comments
6622	Introduction to WIC Module	2015	0.25	1	2 - 5	
	Breastfeeding Level 1 Online Course	2013	1	1	1.5	Must be completed prior to counseling participants
6614	Breastfeeding Level 2 Module (or Breastfeeding Level 2 Training)	2004	6	2	6 - 9	Must be completed prior to counseling participants
	PCS - Setting the Stage Online Course	2014	3	2	1.5	
	WIC Participant Centered Education Online Course	2010	3	2	7 - 8	10 Online modules
	Baby Behaviors Online Course	2013	6	2	2.5	
6636	Food Package Module	2015	1	1	2 - 5	Peer Counselors do not have to complete this module if they are 100% BFPC. If they are assigned clerk or CPA duties it is required.

WIC Training Modules or Courses to be completed by: CPA's

Order # (57-#)	Module or Course Name	Print or Publish Date	New hire complete within # months	Level (1=all staff, 2=CPA)	Estimated time needed to complete (hours)	Comments
6622	Introduction to WIC Module	2015	0.25	1	2-5	
	Breastfeeding Level 1 Online Course	2013	1	1	1.5	
	Anthropometric Online Course	2012	1	2	2	Must be completed by staff prior to taking measurements
	Hematology Online Course	2012	1	2	2	Must be completed by staff prior to taking blood
6636	Food Package Module	2015	1	1	2 - 5	
	PCS – Setting the Stage Online Course	2014	3	1	1.5	
	Basic Nutrition Online Course	2013	3	2	4	
6601	Dietary Risk Module	2010	3	2	8	Must be completed prior to doing certifications
6634	Nutrition Risk Module	2015	3	2	7 - 11	Must complete the workbooks for client category prior to doing certifications
	WIC Participant Centered Education Online Course	2010	3	2	7 - 8	10 modules,
	Prenatal Nutrition Online Course	2012	6	2	2	Must be completed prior to certifying pregnant women
	Child Nutrition Online Course	2012	6	2	2	Must be completed prior to certifying children
6624	Infant Feeding and Nutrition Module	2014	6	2	2-3	Must be completed prior to certifying infants

STAFF TRAINING REQUIREMENTS, *cont.*

Appendix A, *continued*

Order # (57-#)	Module or Course Name	Print or Publish Date	New hire complete within # months	Level (1=all staff, 2=CPA)	Estimated time needed to complete (hours)	Comments
6626	Infant Formula Module	2014	6	2	3	
6614	Breastfeeding Level 2 Module	2004	6	2	6 - 9	Or can attend the Breastfeeding Level 2 Training Must be completed prior to certifying breastfeeding women
	Postpartum Nutrition Online Course	2012	6	2	2	Must be completed prior to certifying non-breastfeeding postpartum women
	Baby Behaviors Online Course	2013	6	2	2.5	
6619	Providing Participant Centered Groups	2013		NE	9 - 10	Must complete before providing any group nutrition education

**WIC Training Modules or Courses to be completed by:
WIC staff who only perform lab functions**

Order # (57-#)	Module or Course Name	Print or Publish Date	New hire complete within # months	Level (1=all staff, 2=CPA)	Estimated time needed to complete (hours)	Comments
6622	Introduction to WIC Module	2015	0.25	1	2- 5	
	Anthropometric Online Course	2012	1	2	2	Must be completed prior to taking measure- ments
	Hematology Online Course	1997	1	2	2	Must be completed prior to taking blood
6636	Food Package Module	2015	1	1	2 - 5	
	Breastfeeding Level 1 Online Course	2013	1	1	1.5	
	PCS – Setting the Stage Online Course	2014	3	1	1.5	



SECTION: Local Program Operations
SUBJECT: **FOOD BENEFIT ISSUANCE**
DATE: June 1, 2016 (*revised*)

511

POLICY: Local programs shall implement a food benefit issuance procedure to ensure WIC participants receive food benefits at their initial certification and at subsequent nutrition education and follow up appointments.

PURPOSE: To provide guidance for local WIC program staff on when to appropriately issue food benefits.

RELEVANT REGULATIONS: §246.12 ¶(r)—Issuance of food instruments, cash value vouchers and authorized supplemental foods.
§246.7 ¶(f)(2)(iv) – Processing Standards: Time frames for processing applicants

OREGON WIC PPM REFERENCES:

- ◆451—Change in Guardianship
- ◆501e—Ordering and Securing eWIC cards
- ◆510e—eWIC Cardholder Requirements
- ◆561e—Program Integrity: Replacement of Food Benefits
- ◆595e—Program Integrity: Separation of Duties
- ◆610e—Required Proofs: Identity, Residency, Income
- ◆616—Unavailable Proofs
- ◆620—Certification and Issuing Benefits to Relatives, Friends and Co-workers
- ◆635e—Participant Notification: Eligibility and Rights & Responsibilities
- ◆640e—Documentation Requirements in TWIST
- ◆641e—Documentation Requirements in the Absence of TWIST
- ◆646—Mid-Certification Health Assessment
- ◆655—Homeless Applicants
- ◆712—Breastfeeding: Breast Pump Ordering, Distribution and Tracking Guidelines
- ◆735—Exchange and Handling of Returned Formula
- ◆769—Assigning WIC Food Packages
- ◆821—Nutrition Education: Telephone Contact for High Risk Participants with the RD
- ◆823—Nutrition Education: Second Nutrition Education Using Online Education
- ◆835—Nutrition Education: Attendance or Refusal

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 1100 —Family Summary Screen

DEFINITIONS:

<i>Food Benefits</i>	The foods a participant receives on WIC for a selected month. Depending on the participant category, food benefits provide specific amounts of WIC authorized foods, formulas, and/or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a “Cash Value Benefit” or “CVB”).
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FOOD BENEFIT ISSUANCE, cont.

<i>Electronic Benefit Account (EBA)</i>	An account established for each WIC family administered by the Oregon’s eWIC banking contractor. Accounts are identified by the WIC family ID number assigned to that family. Food benefits for all participants in the family are aggregated into a single account.
<i>Food Benefit Balance</i>	Unspent issued food benefits which are available for purchase by a cardholder during authorized benefit timeframe.
<i>eWIC Card</i>	Magnetic stripe card used to purchase WIC authorized foods or formulas from a WIC family’s Electronic Benefit Account (EBA). Each card has a 16-digit Primary Account Number (PAN).
<i>First cardholder</i>	The required cardholder for a WIC family Electronic Benefit Account (EBA). The first cardholder is either the woman participant or the parent or caretaker from the same household as the infant or child participant(s), therefore sharing the same address.
<i>Second cardholder</i>	The optional cardholder who has been issued the second eWIC card with the permission of the first cardholder. The second cardholder may attend nutrition education appointments, bring in a child for certification appointments and purchase WIC food benefits using an eWIC card.
<i>Single issuance</i>	When a participant is issued Food Benefits for one month (also referred to as “one month issuance”).
<i>Double issuance</i>	When a participant is issued Food Benefits for two months (also referred to as “two month issuance”).
<i>Triple issuance</i>	When a participant is issued Food Benefits for three months (also referred to as “three month issuance”).

PROCEDURE:

When to issue food benefits

- 1.0 Food benefits issuance should be coordinated with regularly scheduled WIC appointments whenever possible. Once the CPA has assigned the appropriate food package, food benefits shall be issued for participants for the following reasons:
 - 1.1 Initial program enrollment for new WIC participants.
 - 1.2 The next three months of food benefits are available to issue at a nutrition education contact.
 - 1.3 Recertification of WIC participants.
 - 1.4 To replace food benefits as allowed by ♦561–Program Integrity: Replacing Food Benefits

FOOD BENEFIT ISSUANCE, cont.

- Last month to issue food benefits* 2.0 Participants are eligible to receive food benefits through the last month of their certification period.
- 2.1 A **child** may receive food benefits through the month of his or her fifth birthday.
- 2.2 A **nonbreastfeeding** or **some breastfeeding postpartum woman** may receive food benefits through the sixth month after her pregnancy ends. A **some breastfeeding** woman may continue to receive all other program benefits through the month of her child's first birthday.
- 2.3 An **exclusively or mostly breastfeeding woman** may receive food benefits through the month of her child's first birthday.
- 2.4 A **pregnant woman** may receive food benefits for six weeks after the end of pregnancy rounded to the end of the month.
- Food Benefit Issuance* 3.0 Issue **three months** of food benefits, unless there is a situation that warrants less than triple issuance (see ¶3.2 and ¶3.3). Food benefits may be issued to the first or second eWIC cardholders who provide appropriate documentation of identity. See ♦610—Required Proofs: Identity, Residency, Income.
- Partial packages* 3.1 Issue the partial package assigned by TWIST for the current month for new and reinstated participants receiving food benefits on or after the 20th of the month. Partial packages are not required for participants in a current certification period. Food packages may always be tailored after the 20th to meet the needs of the participant for the remainder of the month.
- Single issuance required* 3.2 In the following situations, single issuance of food benefits is **required**:
- RX or HP authorization needed (automatic single issuance in TWIST);
 - Eligibility pending (automatic single issuance in TWIST);
 - Missed nutrition education appointment (see ♦835—Nutrition Education: Attendance or Refusal for more information and for exceptions to the single issuance requirement);
 - Missed mid-point health assessment for infants and children (see ♦646—Mid-Certification Health Assessment for more information and for exceptions to the single issuance requirement);
 - Custody dispute;
 - Unresolved program integrity issue (program abuse, sanctions, overdue multi-user breastpump, etc.).

FOOD BENEFIT ISSUANCE, cont.

- Single or double issuance optional* 3.3 Local program staff **may** issue single or double month’s food benefits on a case by case basis. Examples are listed below.
- Foster child
 - Multi-user breast pump on loan
 - High risk participant
 - Trial of new formula
- NE Refusal* 3.4 Local agencies may issue up to three months of food benefits in the rare situation when a participant refuses all nutrition education (NE) and the refusal is documented in TWIST. Refer to ♦835—Nutrition Education: Attendance or Refusal.
- Issuance of benefits over the phone* 4.0 Issuance of benefits may be done over the phone in the following situations:
- 4.1 After proofs of identity, residence, and income have been received and “eligibility pending” status is removed.
 - 4.2 After changes have been made to the WIC food package, mid-certification, by a competent professional authority (CPA).
 - 4.3 Issuance of supplemental formula, mid-certification, to a participating infant by a CPA following a full assessment (see Policy 713: Breastfeeding: Use of Supplemental Formula).
 - 4.4 Change in the form of formula (for example, from powder to concentrate) in the middle of a certification period.
 - 4.5 Upon completion of online NE & required phone follow-up with a designated WIC staff person or after a high-risk phone appointment with the RD. Refer to ♦823—Second Nutrition Education Using Online Lessons and ♦821—Telephone Contacts for High Risk Clients with the RD.
- Timeframe for food benefit issuance following a paper certification* 5.0 After completing a paper certification, local program staff have **two working days to** enter the data into TWIST and issue food benefits for the participant. Refer to ♦641—Documentation Requirements in the Absence of TWIST for more information.
- Issuing food benefits to relatives, friends and co-workers* 6.0 Local WIC program staff members **may not** issue food benefits for themselves, relatives, friends or co-workers. Refer to ♦620—Certification and Issuing Food Benefits to Relatives, Friends and Co-workers for additional guidelines.

FOOD BENEFIT ISSUANCE, cont.

*Hospitalized or
institutionalized
participants*

- 7.0 Benefits may not be issued to a WIC participant who is hospitalized or institutionalized.
- 7.1 When a WIC participant is in a hospital, long term care facility or institution, WIC food benefits cannot be issued until discharge, since the institution is responsible for feeding the patient.
- 7.2 If an infant is with the mother who is staying in a residential treatment center, See ♦655–Homeless Applicants for an exception which allows the infant to receive infant foods and infant formula. ★

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SECTION: Certification 610
SUBJECT: **REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME**
DATE: July 1, 2016 (*revised, released pending USDA approval*)

POLICY: All WIC applicants and participants (women, infants and children) shall provide the required proofs in order to receive WIC benefits. Proof of identity, residency, and income are required at every certification or re-certification. Proof of identity and residency is required when transferring from out of state. The WIC program also requires proof of identity for food benefit issuance.

PURPOSE: To assure proper verification of identity, residency, and income of WIC applicants or participants.

RELEVANT REGULATIONS: 7 CFR §246.7 ¶(c)(2)(i)—Proof of Residency and Identity
 7 CFR 246.7 (d)(2)(v)-Income Eligibility Documentation
 ASM 99-54—Strengthening integrity in the WIC certification process
 WPM 2013-3 – Income Eligibility Guidance

OREGON WIC PPM REFERENCES: ♦510—eWIC Cardholder Responsibilities
 ♦590—Program Integrity: Participant Violations
 ♦612—Income Eligibility: Adjunct or Automatic Income Eligibility
 ♦613—Income Eligibility: What Counts as Income?
 ♦616—Unavailable Proofs
 ♦620e—Certification and Issuing Benefits or eWIC Cards to Themselves, Co-workers, Relatives or Friends
 ♦621e—Providing WIC Services in Non-WIC Settings

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 102—Enrollment

APPENDICES: Appendix A 610.8 Examples of Proof of Income for Types of Income

DEFINITIONS:

<i>Acceptable proof</i>	Reasonable documentation of personal identity, income and current residency as approved by the state WIC program.
<i>Caretaker</i>	A person who has significant responsibility for providing food to the infant or child. The caretaker is usually part of the family unit, for example the parent or legal guardian of the infant or child.
<i>Individual</i>	An applicant or a participant.
<i>Residency</i>	The location or address where an individual routinely lives or spends the night, and, need not represent a legal residence.
<i>Cardholder</i>	A person authorized by WIC to use the eWIC card to shop for WIC food benefits at WIC-authorized vendors.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

<i>First Cardholder</i>	The required cardholder for a WIC family Electronic Benefit Account. The first cardholder is either the woman participant or the parent or caretaker from the same household as the infant or child participant, therefore sharing the same address.
<i>Second Cardholder</i>	The optional second cardholder who has been issued their own eWIC card with the permission of the first cardholder.
<i>eWIC Card</i>	Magnetic stripe card used to purchase WIC authorized foods or formulas from a WIC family's Electronic Benefit Account (EBA). Each card has a 16-digit Primary Account Number (PAN). Also referred to as a food instrument.

PROCEDURE:

Guidelines for obtaining proof of identity, residency, and income

- 1.0 Each local program must instruct incoming applicants, participants, parents, or caretakers to provide **acceptable proof of identity, residency, and income** when enrolling in the WIC program and at re-certification. The same proofs are required regardless of where the certification is conducted. See ♦621—Providing WIC Services in Non-WIC Settings. Proof of identity and residency are required when transferring into the WIC program from out of state. Refer to ¶5.0 for a listing of acceptable proofs for identity and ¶12.0 for a listing of acceptable proofs for residency.
 - 1.1 Local programs should establish practices that minimize the occurrence of applicants or participants arriving at the clinic without the necessary proofs.
 - Routinely and clearly communicate the kinds of information participants need to provide at their certification appointments for initial and continued service.
 - Consider handing out reminders regarding required proof documents and include proof information with appointment reminders.

Documentation requirements

- 2.0 Document proofs of residence, identity and income in TWIST. Identity is **only** documented for applicants or participants. Income and residence is documented for the household.
 - 2.1 If “Other” is selected as the type of proof, document the specific type of proof seen in the Enrollment Notes in TWIST.
 - 2.2 For more information on documenting proofs in TWIST, refer to TWIST Training Manual, Chapter 3, Lesson 102—Enrollment.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

PROOF OF IDENTITY: 3.0 Proof of identity must be provided for all participants, including infants and children.

Benefit issuance 4.0 Cardholders being issued food benefits when in the WIC office must show proof of their identity before issuance. This includes food benefits issued at the time of enrollment, re-certification or nutrition education.

EXAMPLE: A non-participating adult who is a parent or caretaker bringing a child in to be re-certified must show proof of their own identity in order to have benefits issued. See ¶5.0 for more information.

4.1 Local program staff must ***check*** the identity of a non-participating adult who accompanies an infant or child for enrollment or re-certification but are ***not required to document*** that verification.

4.2 If a non-participating adult accompanying an infant or child does not have their own proof of identity, issue one month of food benefits and an eWIC card. Schedule the participant for an appointment the following month to bring in the necessary proof of identity at that time. Normal issuance of food benefits may begin after the adult has shown proof. The 30 day termination process outlined in ♦616—Unavailable Proofs does not apply in this circumstance.

4.2.1 In special circumstances, the WIC Coordinator may choose to document the non-participating adult’s lack of proof in TWIST and treat it as no proof due to special situations, as described in ♦616—Unavailable Proofs.

4.2 Before issuing benefits based on a phone request, staff must verify the identity of the cardholder by asking for the cardholder’s name, date of birth, and zip code and comparing it to information on the Family Cardholder Screen.

Types of acceptable proof of identity 5.0 When proof of identity is required, applicants, participants, parents, caretakers or proxies in lieu of disqualification will need to show ***acceptable*** proof of identity. A parent or caretaker must provide an infant or child’s acceptable proof of identity at enrollment or re-certification (refer to ♦510e—eWIC Cardholder Responsibilities for information on who may bring in an infant or child for enrollment or re-certification). The proof of identity may be any of the following forms of identification that includes the individual’s name:

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

<i>Adults</i>	5.1	Acceptable proof of identity for adults: <ul style="list-style-type: none">• Social Security Card• Employee ID card• Pay stub• DHS Medical Care ID Card or Oregon Health ID Card (not the website)• Driver's license, or state-issued ID card• Passport• Birth certificate• INS documents• Precinct Memorandum Card (Voter Registration Card)• School ID card
<i>(Types of acceptable proof of identity)</i>		
<i>Infants and children</i>	5.2	Acceptable proof of identity for infants and children: <ul style="list-style-type: none">• Social Security Card• Home birth record• Note from doctor or midwife on letterhead or prescription pad, documenting infants birth• DHS Medical Care ID Card or Oregon Health ID Card (not the website)• Hospital birth record, crib card or ankle bracelet• Birth certificate• Immunization record
<i>Health record</i>	5.3	The individual's hard copy health record is acceptable proof of identification for: <ul style="list-style-type: none">• Applicants for whom the health department has a birth certificate or birth abstract; or• Applicants who are already receiving health department or program services (e.g., immunizations, family planning, well-child clinic, etc.) where proof of identity was already required.
<i>Other types of acceptable proof of identity</i>	5.4	This list is not exhaustive. If questions about other forms of proof arise, please contact your state nutrition consultant. To be approved the document must have initially required proof of identity to be issued. Proof of ID does not have to be current in order to be acceptable. In some cases, the approved form of proof may be in an on-line format.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

(Other types of acceptable proof of identity)

EXAMPLE: A letter addressed to the participant may show proof of residency, but does not prove identity. An infant's name on a prescription alone does not indicate the doctor has determined identity by requiring proof of identity or by presence at the infant's birth.

EXAMPLE: Government issued ID from other states or countries may be acceptable proof of ID. A Mexican driver's license or an Idaho Medicaid card would be acceptable proof of ID, even if it is expired because it required proof of identity to be issued originally.

EXAMPLE: An on-line pay stub or an on-line immunization record may be acceptable as they have already been identified as approved forms of proof. WIC staff should not request passwords or other confidential information to access on-line forms of proof.

Transfer (VOC) card

6.0 A valid WIC transfer card or Verification of Certification (VOC) card is ***not an acceptable*** proof of identity. It represents proof of nutritional risk and current income eligibility for a participant moving into Oregon only for the current certification period.

WIC issued ID cards

7.0 For convenience to adult participants, parents or caregivers, once proof of identity is provided for a participant, local agency staff may issue a WIC ID card. The WIC ID card is acceptable proof of identity for all infants/children or women participants listed on the WIC ID card at subsequent appointments, even if there have been gaps in receipt of WIC service.

7.1 WIC issued ID cards are for the convenience of the WIC family and are not required at appointments. They serve as an additional Proof of Identity option.

7.2 Print or type the participant's name and ID number on the WIC issued ID card (Form 57-620) after proof of identity for that participant has been reviewed.

7.3 If in special circumstances, the participant, parent or caregiver is unable to provide proof of identify for a participant, staff may follow the process described in ♦616—Unavailable Proofs, and issue a WIC ID card for the duration of the certification period. In that case, an expiration date of the end of the certification period should be added after the participant name on the WIC ID card, ensuring that another form of proof of identity is requested at the next certification appointment.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

- ID for Cardholders*
- 7.4 A WIC ID card cannot be issued for non-participant adults or eWIC cardholders.
- 7.5 Cardholders must show proof of identity at certification and re-certification and at appointments when benefits are issued.
- 7.5.1 The eWIC card does not act as proof of identity for eWIC cardholders because we do not see proof of identity for both cardholders at issuance, the name of the cardholder is not printed on the card, and there is no way to verify the PIN in the clinic. See ♦510e—*eWIC Cardholder Responsibilities* for more information.
- Temporary newborns*
- 8.0 Infants certified for WIC over the phone as temporary newborns must have their parent or caretaker show the infant’s proof of identity at the 6 week postpartum visit.
- 8.1 In this circumstance, no 30 day grace period is allowed (See ♦616—Unavailable Proofs). Inform parents and caretakers of this requirement at the time the temporary enrollment is initiated.
- Personally known participants*
- 9.0 Once acceptable identification has been provided and established at the initial WIC appointment, and if the applicant or participant is personally known to local program staff, this can constitute proof of identity at subsequent appointments and for benefit issuance. Please refer to ♦620—Certification and Issuing Benefits or eWIC Cards to Themselves, Co-Workers, Relatives and Friends for guidelines on determining eligibility or issuing benefits to relatives and friends.
- PROOF OF RESIDENCY:**
- 10.0 Applicants or participants must reside within the jurisdiction of the State. Applicants and participants **do not** have to be U.S. citizens or permanent residents. All applicants and participants must show acceptable proof of residency at initial certification, re-certification, and when transferring in from another state.
- Definition of “residency”*
- 10.1 Residency means the location or address where an applicant or participant routinely lives or spends the night. The length of residency does not impact WIC eligibility and is not a prerequisite to receiving WIC benefits.
- 10.2 An adult member of a household who is not a WIC applicant or participant may show acceptable proof of residency for other member(s) of that household who are applying or participating in WIC, e.g., infants, children, teen moms or domestic partners.
- Citizenship or alien status*
- 10.3 Inform individuals that WIC does not require proof of citizenship or legal alien status, only proof of residency. Proof of residency is not proof of citizenship.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

10.4 Local programs should implement proof of residency in a way that does not constitute a barrier to any individual, especially to an individual who does not have a fixed address (e.g. homeless individual, military personnel or migrant).

11.0 Proof of residency is **not required** for benefit issuance after proof of residency has been established at eligibility screening.

Types of acceptable proof of residency

12.0 Listed below are types of acceptable proof of residency:

- Oregon ID card or driver’s license
- Current utility bills
- Current rent or mortgage receipts
- Bank statements or bank checks with current address
- Letters/notifications addressed to the participant with current address
- Precinct Memorandum Card (Voter Registration Card)

NOTE: If the individual’s card shows the precinct is in your geographic service area, this counts as proof of residency.

12.1 In some cases, the approved form of proof may be in an on-line format if it shows the address, e.g. on-line utility bill or bank statement.

Not acceptable for proof of residency

13.0 The following are **not** acceptable for proof of residency.

13.1 The WIC ID card or eWIC card is **not an acceptable** proof of residency.

13.2 A P.O. Box number is **not an acceptable** proof of residency. The proof document must show the actual street address.

13.3 The OHP ID card is not proof of residency.

PROOF OF INCOME:

14.0 Applicants and participants must show proof of income for all household members at the time of enrollment and recertification.

Adjunctively income eligible for WIC

15.0 Applicants or participants are adjunctively income eligible for WIC if they can show proof that they currently participate in Medicaid/OHP, TANF, SNAP, or Food Distribution Program on Indian Reservations (FDPIR).

15.1 Refer to ♦612—Income Eligibility: Adjunct or Automatic Income Eligibility, for procedures on certifying adjunctively income eligible individuals who can show proof that another member of their household currently participates in TANF or Medicaid/OHP.

REQUIRED PROOFS - IDENTITY, RESIDENCY, INCOME, cont.

- Automatically eligible for WIC*** 16.0 Migrant farm-workers with WIC transfer (VOC) cards showing income determination was within the last twelve months are automatically income eligible for WIC. Refer to ♦612—Income Eligibility: Adjunct or Automatic Income, for procedures on certifying automatically income eligible individuals.
- Proof of income eligibility*** 17.0 If individuals are not adjunctively or automatically income eligible, proof of income from traditional sources is required.
- Types of acceptable proof of income*** 18.0 Listed below are types of acceptable proof of income:
- Proof of **current** eligibility for Medicaid or Oregon Health Plan (OHP), Temporary Assistance to Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) or the Food Distribution Program on Indian Reservations (FDPIR), constitutes documentation of adjunctive WIC income eligibility.
 - Current pay stubs or letter from employer documenting income
 - Unemployment benefit stubs
 - Benefits or earning statements
 - W-2 Forms
 - Income tax return
 - Other appropriate documents sufficient for establishing income
 - WIC transfer card (VOC) for a current certification period
 - Migrant applicant with a WIC transfer card showing income determination within the last 12 months.
- 18.1 See Appendix A for Examples of Proof of Income for Types of Income.
- 18.2 In some cases, the approved form of proof may be in an on-line format, e.g. OHP website or pay stub.
- 18.3 Local programs may choose to request a written statement from a reliable third party that has knowledge of the individual’s income to use as proof of income for individuals who do not have access to more traditional income documentation. This might include migrants, refugees, or individuals working for cash. Reliable third parties might include staff of a social service agency, sponsoring organization, legal aid society or employers. This is not, however, required and local programs may also use the “No Proof for Special Situations” form.
- 19.0 See ♦613—Income Eligibility: What Counts as Income? for a complete listing of what is included as income or excluded from household income. ★

**If you need this in large print or an alternate format,
please call (971) 673-0040.
WIC is an equal opportunity program and employer.**

Examples of Proof of Income for Types of Income

(Refer to ♦613—Income Eligibility: What Counts as Income? for a complete listing).

For this type of Income:	Use this type of Proof of Income:
Monetary compensation for services, including wages, salary, commissions, or fees (including overtime payments with wages and salary)	<ul style="list-style-type: none"> • Current pay stub(s) noting the pay time frame (weekly, biweekly, monthly, etc.) • Signed statement from employer indicating gross cash earnings for a specified period
Net income from farm and non-farm self-employment	<ul style="list-style-type: none"> • W-2 forms or income tax return for the most recent calendar year • Accounting records for the self-employed
Social Security benefits	<ul style="list-style-type: none"> • Check stub/award letter from Social Security stating current amount
Dividends or interest on savings or bonds, income from estates, trusts, or investments	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year • Bank or account statements
Net rental income	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year
Foster care	<ul style="list-style-type: none"> • Foster child placement letter/foster parent award letter
Unemployment compensation	<ul style="list-style-type: none"> • Unemployment letter/notice
Government civilian employee, military personnel, or military retirement or pensions, veterans' payments	<ul style="list-style-type: none"> • Recent Leave and Earnings Statement (LES) for military personnel
Private pensions or annuities	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year
Alimony or child support payments	<ul style="list-style-type: none"> • Divorce decree • Statement from Child Support Division issued VISA (Reliacard) • Copy of check received
Regular contributions from persons not living in the household	<ul style="list-style-type: none"> • Letter from person contributing resources to the household
Withdrawals from any source, including savings, investments, trust accounts and other resources are readily available to the family.	<ul style="list-style-type: none"> • Bank or account statements indicating regular draws on the account(s)
Student financial assistance, such as grants and scholarships. This does not include loans.	<ul style="list-style-type: none"> • Award letter • Scholarship letter
Adjunctive Eligibility	Notice of Award or Approval letter for SNAP or TANF, or Medicaid/OHP web portal showing current eligibility dates



SECTION: Certification 611
SUBJECT: **INCOME ELIGIBILITY: Determining income eligibility**
DATE: July 1, 2016 (*revised, released pending USDA approval*)

POLICY: Local WIC program staff shall determine income eligibility for all WIC applicants and participants at certification and re-certification appointments.

PURPOSE: To assure WIC services are provided for those who need them, using income guidelines that are consistent statewide.

RELEVANT REGULATIONS: 7CFR §246.7 ¶(d)(2)—Income Eligibility Determination
ASM 99-54—Strengthening Integrity in the WIC Certification
Process WRO Policy Memo 803-AX (ASM 03-29) Family Size and Income Determination for Military Families
FNS Instruction 803-3, Rev. 1—WIC Program – Certification: Income Eligibility
WIC Policy Memorandum #2011-7 – Conversion Factors for WIC IEG’s (supersedes some portions of FNS Instruction 803-3)
WIC Policy Memorandum #2013-3 Income Eligibility Guidance

OREGON WIC PPM REFERENCES: ♦ 541—Change in Guardianship
♦ 610—Required Proofs – Identity, Residency, Income
♦ 612—Income Eligibility: Adjunct or Automatic Income Eligibility
♦ 613—Income Eligibility: What counts as income?
♦ 614—Income Eligibility: Current Income Guidelines
♦ 615—Income Eligibility: Change In Income
♦ 616—Unavailable Proofs

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 102, Enrollment
Chapter 3, Lesson 100—Applicant Prescreening

APPENDIX: 611.12 Appendix A Flow Chart: Determining Income Eligibility

DEFINITIONS: *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 Gross income, including overtime, before deductions for income taxes, employees’ social security taxes, insurance premiums, bonds, etc. The determination of the amount of a household’s gross income shall not be considered reduced for any reason (e.g.; financial hardships, medical bills, child support).

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

<i>Annual income guidelines</i>	USDA updates the federal poverty income levels annually. Local programs will implement the new guidelines according to State instructions (usually May 1). The statewide WIC income eligibility standard is 185% of the federal poverty income guidelines.
<i>Current income guidelines</i>	Current income guidelines are in ♦614—Income Eligibility: Current Income Guidelines and on the WIC web page at http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/income.aspx .
<i>Individual</i>	An applicant or a participant.

BACKGROUND: One criterion for an applicant or a participant to be eligible to receive WIC benefits is income eligibility. The Oregon WIC program uses a household income eligibility standard of 185 percent of the federal poverty income level. For current income levels refer to ♦614—Income Eligibility: Current Income Guidelines.

The living situations of WIC applicants and participants are often complex. These policies relate federal guidelines to circumstances often encountered by local staff in screening for participant income, but no policy can encompass every circumstance. An equitable income determination often depends on the best judgment of an income screener, who should keep in mind that the intent of the WIC income limits is to direct services toward people in financial need.

PROCEDURE:

- | | | |
|--|-----|---|
| <i>Determination of income eligibility</i> | 1.0 | At the initial or subsequent certification appointments, determine if the applicant or participant is income eligible based on their household size. Refer to Appendix A, Flow Chart: Determining Income Eligibility for an overview of this process. |
| <i>Adjunct or automatic eligibility</i> | 2.0 | Prior to performing a standard income screening, determine if an individual is automatically/adjunctively income eligible. If individuals cannot prove adjunct/automatic eligibility at the certification appointment, use the standard income screening. Refer to ♦612—Income Eligibility: Adjunct or Automatic Income Eligibility for additional procedures |
| | 2.1 | Migrant farm workers income is determined once, per family, per year. Refer to ♦612—Income Eligibility: Adjunct or Automatic Income Eligibility for income determination of migrant farm workers. |

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, cont.

- Standard income screening** 3.0 If the individual is not automatically or adjunctively income eligible, use the standard income and household screening procedure:
- 3.1 Determine the number of persons living in the household who are supported by the income and document in TWIST. Refer to ¶4.0 of this policy for determining household size.
- 3.2 Determine the household’s current gross monthly income from all sources for the entire household. Refer to ♦613—Income Eligibility: What counts as income?

3.2.1 Staff must review approximately 30 days of proof. The table below indicates the number of pay stubs to review for each type of pay period. The average of the amounts on the paystubs should be entered in TWIST using the corresponding pay period.

Pay period	# of pay stubs to review	Average to enter in TWIST
Monthly	1	NA
Weekly	4	Add 4 together, divide by 4
Twice a month	2	Add 2 together, divide by 2
Every 2 weeks	2	Add 2 together, divide by 2

- 3.2.2 Ask for proof of income for all sources of income. Applicants or participants shall present proof substantiating reported income for the entire household. Refer to ♦610—Required Proofs—Identity, Residency, Income.
- 3.2.3 If the household has multiple sources of income, each should be documented in TWIST with its own interval and proof. TWIST will total the amounts and convert it to an annual income.
- 3.2.4 In some cases the annual income better represents the household income, such as income that fluctuates or is seasonal. See ¶9.0 for details.
- 3.2.5 Local program staff shall use net income to determine income eligibility only for farmers and self-employed persons. Net income is determined by subtracting the operating expenses from the gross income.
- 3.3 Consider any special circumstances that may impact income status or household size (e.g., unemployment, foster child, pregnant woman, teenage mother, military income, Medicaid applicant or participant, etc.).
- 3.4 An individual is income eligible when the household income is at or below the WIC income standards. For current income levels refer to ♦614—Income Eligibility: Current Income Guidelines.
- 3.5 If the individual is income eligible, proceed with the certification process.
- 3.6 Refer to ¶12.0 if the individual is not income eligible.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

Household size 4.0 Determine the individual's household size.

- Pregnant women***
- 4.1 First determine if the total household of the pregnant woman is within income limits. When determining household size, local program staff must count a pregnant woman as two, and in the case of multiples, count each fetus as an additional member of the household. The woman can waive this increase in household size if she wishes.
 - 4.2 Use the same household size when determining eligibility of other household member(s) of the pregnant woman.

EXAMPLE 1: Doris Mason is married and pregnant. She and her husband have an eight-month-old infant and a two-year-old child. Her total household size is 5.

EXAMPLE 2: Under the same scenario, if Doris applies for WIC for her eight-month-old infant or her two-year-old child, the household size of five will apply.

EXAMPLE 3: Molly Cules is a single mom expecting twins. She also has a three-year-old child. Molly applied to be on WIC. Her household size is 4.

Shared custody

- 4.3 When custody of a child is shared, the child shall be considered a member of the household in which he or she lives a majority of the time (50 percent or more). When a child lives with each parent 50 percent of the time, consider the child a member of the family who applies for WIC services first.

- 4.4 Local programs can count the child as a member of only one household, and should screen for dual participation if the other parent applies for WIC services. A parent paying child support may not claim that child as a member of his or her household unless the child lives with that parent 50 percent or more of the time and the child is not on WIC with the other parent. Assess only the income of the family in which the child is counted when determining eligibility. Inform the family that the food should go with the child when he or she is with the other parent. Refer to ♦451—Change in Guardianship for more information on shared custody situations.

EXAMPLE: Tiffany Sands' mother and father have joint custody of her. Tiffany lives one week with her mother, Laura Sands, and one week with her father, Kurt Murphy.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

Tiffany’s mother has Tiffany certified to receive WIC services. Tiffany’s full food benefits go to her mother each month. Tiffany’s father cannot bring Tiffany in and have her certified again. Ideally, her mother and father would arrange for Tiffany to receive WIC food benefits continually over the month. If sharing of the food cannot be arranged, the local program may choose to tailor the food package to reflect an appropriate amount of food for the time spent in the certifying household.

Tiffany’s father, Mr. Murphy, is now living with Amy Klein. They have a son, Ryan. If Mr. Murphy and Ms. Klein apply to enroll Ryan for WIC services, the WIC program should not count Tiffany as a member of their household because she can be counted as a member of only one household.

Foster children or legal guardian

4.5 Consider foster children for whom a state agency has legal responsibility as a one-member household. Payments made by the agency for foster care of the child count as the only income to the household.

Adopted children

4.6 Count adopted children (for whom the family has accepted legal responsibility) as members of that household.

Homeless & institutionalized

4.7 Individuals or families living in an institution or homeless facility may apply as their own household, without including non-related members of the institution in their household size.

4.7.1 Do not count institutionalized individuals as members of a non-institutionalized family. For example, a father in prison would not be counted as part of the household.

Teens

4.8 Pregnant teens and teen mothers are not automatically eligible for WIC services. Determining the appropriate household size of a teenage applicant requires the judgment of the income screener; these cases are rarely simple or clear-cut. The key consideration in determining when individuals or groups are a household (or economic unit) is whether they generate an income sufficient to sustain them, i.e., room, board and medical care. Pregnant teenagers living with a parent or guardian may qualify as their own economic unit if they have an income sufficient to support themselves.

4.8.1 To expedite service, it may be simplest to first determine if the total household (teenagers, parents, and others) is within the income limits. If it is, consider the teenager income eligible and proceed with the certification.

4.8.2 If the total household is not income eligible, the teenager **may** be able to qualify as her own household.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

*Teenager supported
by parents*

4.8.3 Determine if her parents are supporting the teenager; if so, the parents and their income should be included in the household. Factors that indicate the teenager is being supported include:

4.8.3.1 The teenager is living in her parents' house without paying anything toward rent or food, and the parents are contributing toward what she needs for health care during pregnancy.

4.8.3.2 The teenager is living in a separate dwelling from her parents, but generates no income and is dependent for survival on what her parents (or other family) contribute.

*Teenager as own
household*

4.8.4 Local programs must decide whether the teen has an adequate income to provide full support. If so, consider the teen as her own household, without including her parents' income.

4.8.4.1 The teenager is living with her parents but generates income sufficient to provide room, board and medical care (or provides a service of equivalent value, such as babysitting or cleaning).

4.8.4.2 If a teenager is living in her parents' house but is not receiving full support from them, to the degree that she cannot afford the food or services to allow her a healthy pregnancy, consider the teenager as her own household. Any cash support provided by the parents should be considered income.

*Teenager's living
situation*

4.9 Ask a variety of questions to gather sufficient information about the teenager's living situation and then make a reasonable determination of the individual's "household size."

*Teenager living
apart from, but
supported by
parent*

EXAMPLE: Chelsea Sears applies to Serene County WIC clinic. Ms. Sears is 16 and pregnant, and lives with her boyfriend in an apartment. Neither has any income; both are looking for work. Her father gave her the money for the down payment on the apartment; she is still covered under her father's health insurance.

Ms. Sears' income determination should include her father as part of her household, and should include his income. If Ms. Sears or her boyfriend begins generating income and they can continue to live in their own apartment without regular support

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

(Teenager living apart from, but supported by parent)

from her father, she could reapply. Only she and her boyfriend would be included in the household for which income is calculated, even if she continues on her father's insurance.

Teenager living with parents, general income

EXAMPLE: Mariah Hedricks applies to Serene County WIC for WIC services. She is 16 and pregnant. Ms. Hedricks lives with her parents; she and her boyfriend are engaged and plan to be married after the baby is born. Ms. Hedricks is working and pays for room and board. Her fiancé is not working full time, but does occasional car repair jobs. He contributes toward saving for the apartment and supplies for after the baby is born. Serene County Health Clinic is providing Ms. Hedricks' pre-natal care.

Ms. Hedricks and her fiancé should be considered a household. Any income generated by Ms. Hedricks or her fiancé should also be included.

Absent military service

4.10 Military personnel serving overseas or assigned to a military base and temporarily absent from the home should be considered members of the household and income received by military personnel should be counted as income to the household.

EXAMPLE: Tiffany Glass is applying for WIC services for her family. Her husband is in the Army and is currently assigned for 6 months to a military base in Texas. For determination of WIC eligibility, even though Tiffany's husband is not currently living with his family, consider Tiffany's husband as part of the economic unit and count the eligible part of his military income as part of the household income.

Proof of income eligibility

5.0 Determine and document the applicant's household income. For WIC eligibility, income is total gross income (before taxes). Ask the individual to show 30 days proof of income for all members of the household who bring in income or other financial support. Refer to ¶3.2.1 above for more information on required number of pay stubs by interval, and to ♦610—Required Proofs: Identity, Residence, Income for guidance on proofs and ♦613—Income Eligibility: What Counts As Income for guidance on what is included as income.

5.1 The current month's income is usually used for eligibility determination, i.e., the individual's income the day it is being assessed.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

(Proof of income eligibility)

- 5.2 Future income is only used in eligibility determination if an individual has been recently laid off. See ¶10.0 for more guidance.
- 5.3 Annual income is most appropriate if household income fluctuates due to seasonal work. See ¶9.0 below.
 - 5.3.1 Include periods of unemployment in income calculation. Include lay-offs, maternity leave, or seasonal work, if applicable.
- 5.4 Do not include changes in income that **may** happen in the future.

EXAMPLE: Anne Parsons is applying for WIC services. She is on maternity leave and receiving no income. She expects to go back to work in two months; once she is working, her income puts her over the WIC income limits.

WIC income guidelines allow the WIC income screener to consider Ms. Parson’s income what she made over the last year **or** her current monthly income, which would be zero. The screener should use the time period, which most accurately reflects Ms. Parson’s economic situation.

WIC income guidelines would **not** allow the screener to count six months in the future, when Ms. Parsons may return to work, and exclude her from services.

- 5.5 Gross income is reported except for farmers and self-employed individuals in which case net income is reported.

Income verification or reassessment

- 6.0 Local program staff may verify reported income if there is reasonable evidence that the applicant or participant has given inaccurate or untrue information. Refer to ♦615—Income Eligibility: Change in Income for guidance on income verification or reassessment.

Insufficient proof at certification appointments

- 7.0 Refer to ♦616—Unavailable Proofs for procedures when an individual who has applied to be on the WIC program does not provide adequate proof of income at the initial appointment.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, cont.

Zero income 8.0 Individuals declaring zero income should be thoroughly interviewed regarding their living circumstances and how they obtain basic living necessities such as food, shelter, medical care and clothing. Local WIC programs can assist individuals at zero income not only through the provision of WIC services but also through crucial referrals to local sources of aid and assistance.

Given WIC’s definition of family size and income, zero income should occur rarely and usually on a temporary basis. To assure that WIC eligibility rules are correctly applied, thorough screening and appropriate interviewing are necessary.

- 8.1 If an individual reports zero income, ask additional questions to determine if there is any financial or other support for living expenses.
- In most instances, a household’s financial circumstances change and do not remain at zero income indefinitely.
 - If there is support provided by other resources which are readily available to the applicant, such as cash amounts received or withdrawn from any source (including savings, investments, trust accounts, etc.), staff shall consider this information for income eligibility determination.
 - Tell the applicant that any change in income must be reported to the WIC program.

Examples of questions to ask

- 8.2 Ask the individuals reporting zero income to describe in more detail their living situation and how they obtain basic living necessities.
- How are you paying for or receiving food to eat? Shelter and clothing? Medical care?
 - Are you or a member of the household participating in TANF, SNAP, or Medicaid?
 - How are you paying for your bills such as rent, electricity, water, and telephone?
 - How long has the family been without income?

8.2.1 Staff may consider using annual income if that more accurately reflects the household income. See ¶9.0 for information on using annual income.

Required documentation

- 8.3 Document zero income in TWIST when the individual has zero income and no other financial support.
- 8.3.1 Complete the form, “No Proof Form,” (form 57-633) including a statement of why there is no proof.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

- Using Annual Income* **9.0** Annual income should be used when it is a better indicator of the household situation than current monthly income. Consider using annual income in the following situations:
- Seasonally employed
 - Fluctuations in income
 - Teachers or others on year-long contracts
 - Family Medical Leave (maternity leave)
 - College students
 - Self-employed,
 - Farmers
- 9.1 The most current W-2 can be used as proof of annual income, even if it is several months into the following year.
- 9.2 In the absence of a W-2, request as many months of proof as are available and convert them to an annual amount to enter in TWIST with a yearly interval (e.g. 3 months x 4, 4 months x 3, 6 months x 2.)
- 10.0 Determine whether current or future income best represents the household income for individuals experiencing a layoff or strike.

Layoffs

- 10.1 Future income can be considered if the individual can show proof they have been laid off. An employee layoff can be a temporary or permanent event. A temporary layoff would be a condition that is intended to last only a short period of time. A permanent layoff would be a condition that is reported by the applicant to last indefinitely such as a business closing or a reduction in the workforce.
- 10.1.1 Proof of layoff could include unemployment benefit award letter, employer notice of layoff (pink slip).
- 10.1.2 Zero income may be documented in TWIST in these situations.
- 10.1.3 Document the situation and proof in TWIST notes.

EXAMPLE 1: Alice Lamb is 3 months pregnant and applying for WIC benefits for herself and her family. She indicates that her husband's company has decided to lay off workers for three months until the high-tech company can restructure. She shows you his pink slip indicating that his last day is today. The situation and proof is documented in TWIST notes and the income would be documented in TWIST as zero.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

EXAMPLE 2: Anita Smith is applying for WIC benefits for herself and her children. She indicates that the company where she has been employed for the past three years has closed permanently. Mrs. Smith had waited until the second month of the layoff to apply for WIC benefits. Consider Mrs. Smith's current month's income as zero income for the month. Follow the policy guidelines for applicants that report zero income. Remind Mrs. Smith to report any changes that might occur in her monthly income to the local WIC office. Mrs. Smith should also be referred to other sources of aid and assistance.

Strikes and lockouts

10.2 Current income would be used for a strike or lockout. A strike is a temporary labor dispute that could force an employee to have reduced or no income until the labor negotiations resolve the dispute. A lockout occurs when the employer decides to close the business during a labor dispute and will not open the business until after the dispute is resolved.

Usually an employee lockout occurs if the employer recognizes the labor dispute is long term. A strike can also become a long term period of unemployment. In most instances, a household's financial circumstances change and do not remain at zero indefinitely. The applicant should be reminded to report any changes in income to the WIC office. The WIC office should also refer the applicant to other sources of aid and assistance.

EXAMPLE 1: Joe Smith's company is currently negotiating a contract with their employees. Employees have decided to strike until the employee demands have been met, negotiations have concluded and a new contract is in place. Negotiations should be complete with the company within the month. Nancy Smith has applied for WIC benefits. The income for the current month could be zero.

EXAMPLE 2: Tina Jack is applying for WIC benefits for her family. Two months ago her husband's employer closed the business until contract negotiations were resolved. The employer indicated that the company would not reopen until negotiations were complete and the negotiations will take at least 4 months. Consider the household member to have zero income for the months of the lockout.

INCOME ELIGIBILITY: DETERMINING INCOME ELIGIBILITY, *cont.*

11.0 In situations where a change of income is anticipated (e.g. strike ending) the applicant should be reminded to report any changes in income to the WIC office. Staff should document the situation in TWIST notes and reassess income at the next appointment.

Not income eligible

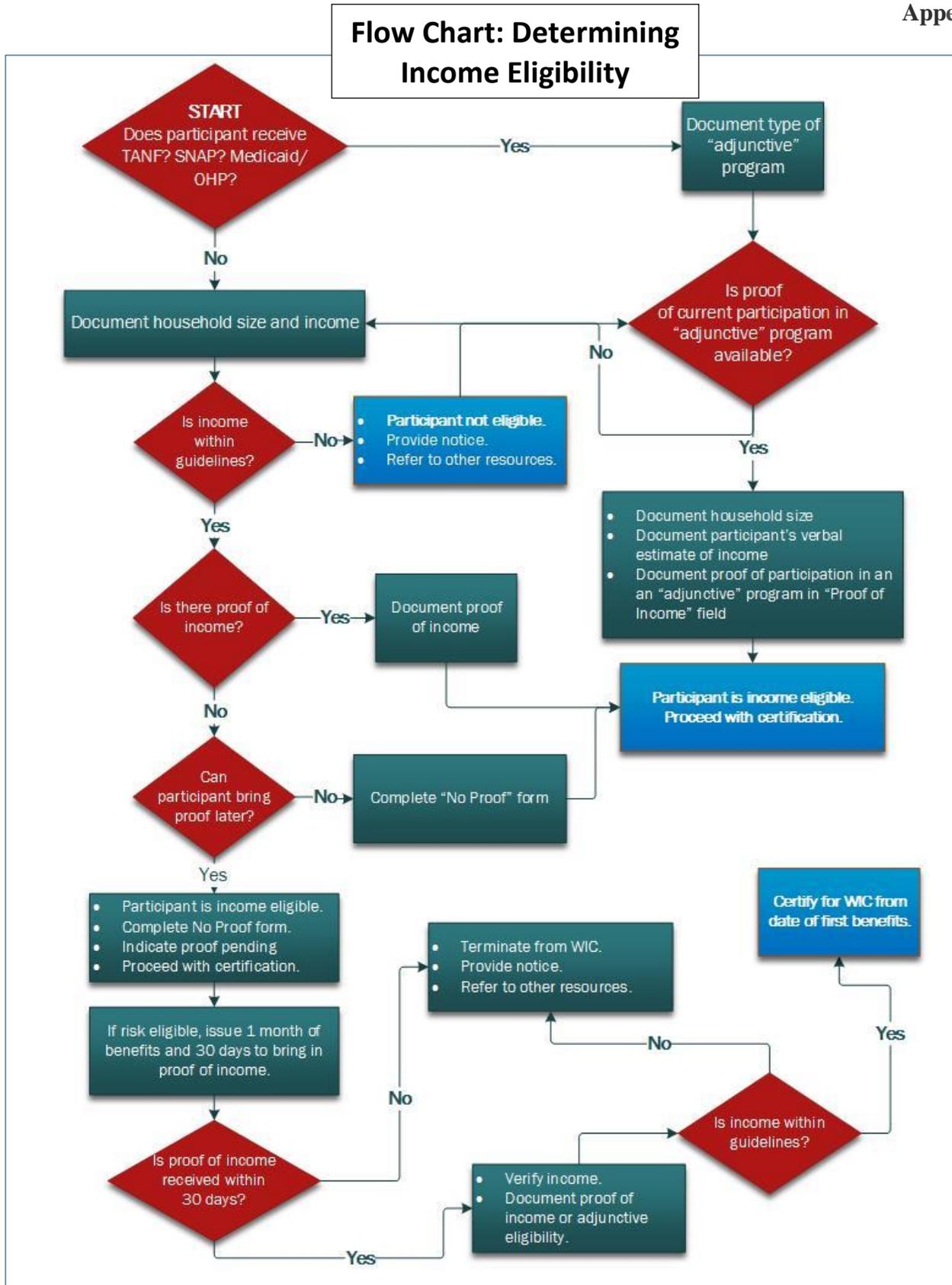
12.0 If the applicant is **not** income eligible, the TWIST data system will display a message that the applicant is not income eligible.

12.1 Give the applicant a written reason for ineligibility and notice of how to apply for a fair hearing. The Ineligibility Notice can be printed from TWIST, or staff may use the “*Notice of WIC Ineligibility*” (form 57-607).

12.1.1 Written notice is required only after a formal in person income screening. Written notice is not required for an informal screening over the phone to help an applicant determine if it is worth her time to come in to the WIC office for a formal income assessment.

12.2 Refer applicants who are not income eligible to other available financial, food or medical services. ★

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SECTION: Certification 613
SUBJECT: **INCOME ELIGIBILITY: What counts as income?**
DATE: July 1, 2016 (*revised, released pending USDA approval*)

POLICY: WIC staff will appropriately include or exclude sources of income when determining whether Oregon WIC applicants or participants meet the federally defined income eligibility standard.

PURPOSE: To comply with the WIC income limits.

RELEVANT REGULATIONS: 7CFR §246.7 ¶(d)(2)(ii)—Definition of income
 7CFR §246.7 ¶(d)(2)(iv)—Income exclusions
 FNS Instruction 803-3, Rev. 1 – Certification: Income Eligibility
 USDA MEMO 803-L—Lump Sum Payments as Income (7/13/92)
 ASM 99-54—Strengthening Integrity in the WIC Certification Process
 WR Policy Memo 803-AV (ASM 02-45) Income Eligibility Determinations for Households Affected by Privatization of On-Base Military Housing
 WR Policy Memo 803-AZ (ASM 04-46) Medicare Prescription Drug Assistance
 ASM 2010-02 Exclusion of Combat Pay from WIC Income Eligibility Determination
 ASM 2010-5 Payments to Certain Filipino World War II Veterans – Exclusion from Income and Resources

OREGON WIC PPM REFERENCES: ♦ 610—Required Proof: Identity, Residence, Income
 ♦ 612—Income Eligibility: Adjunct or Automatic Income Eligibility
 ♦ 611—Income Eligibility: Determining Income Eligibility
 ♦ 614—Income Eligibility: Current Income Guidelines
 ♦ 615—Income Eligibility: Changes in Income

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 102—Enrollment

APPENDICES: 613.8 Appendix A What is Included as Income?
 613.9 Appendix B What is Not Included as Income?

DEFINITIONS: *Attendance costs* For individuals receiving student loans, attendance cost includes regular tuition and fees for students carrying at least a half-time workload as determined by the institution, and an allowance for books, supplies, and transportation required by the course of study.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

5.0 Use the information below to identify what is included or excluded from household income calculations.

This is a summary. See Appendix A and B for a complete list.	
Consider as income	Do <u>NOT</u> consider as income
Money paid for services (gross wages, salaries, tips – before tax)	Certain military allowances – see ¶13.0
Social security benefits, including SSI payments for disabled individuals	Food stamps, other payments from National School Lunch Act programs
Dividends or interest on savings, bonds, incomes from trust	Federal job training program payments
Public assistance, welfare payments	Federal volunteer programs
Unemployment compensation	Federal child care programs
Pension or retirement income (civilian or military)	Federal or state housing & energy assistance programs
Alimony or child support	Federal compensation to Native Americans
Regular contributions from people not living in the Household	Federal compensation for other claims, re- location, disaster, or injury
Net rental income and royalty income	Federal old age assistance
Federal student loans beyond attendance costs	
Net income from farm or self-employment	Federal student loans covering attendance costs– See ¶11.0
Other cash income	One-time, lump sum payments, such as an insurance settlement or property sale – See ¶14.0

Salary 6.0 Salary is gross pay before any deductions, including deductions for taxes, social security, or insurance. It includes payment for work, made directly to the worker with no taxes withheld, such as childcare done in the home.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

- Social Security*** 7.0 Social Security payments made to any member of an applicant's household counts as income. Income also includes SSI for developmentally disabled or disabled individuals paid to an applicant or another member of the applicant's household.
- Interest*** 8.0 The dividends or interest on savings or bonds, incomes from estates or trusts are considered income. Any amount of capital that is **regularly withdrawn** and used to cover household living expenses is also counted as income.
- Retirement income*** 9.0 Pension or retirement payments (such as retirement income received by grandparents or other household members, if part of the household supporting the WIC recipient), are considered income. This includes:
- 9.1 Private pensions or annuities
 - 9.2 Government civilian employee pensions
 - 9.3 Military employee's pensions, including veteran's payment
- Alimony, child support*** 10.0 USDA regulations require that child support or alimony be considered as income to households receiving it, and **not** deducted from the income of the household paying it.
- EXAMPLE:** Jim Pierce pays \$250 a month in child support to Sherry Miller for their daughter Amy. If Sherry Miller applies for WIC, her income includes the \$250 child support payment. If Jim Pierce applies for WIC for a child other than Amy, his income also includes the \$250 he pays in child support. It is not deducted from his total income. Jim Pierce cannot count Amy as a member of his household unless she lives with him 50 percent or more of the time.
- 10.1 Child support may include any regular contributions from people not living in the household but that is made regularly enough that the applicant depends on it.
- Student loans*** 11.0 The part of student loans or grants funded under Title IV of the Higher Education Act of 1965 is not considered income when calculating WIC income eligibility.
- 11.1 Attendance costs paid for by the student loan are not considered income. Attendance costs are defined as regular tuition and fees for students carrying at least a half-time workload as determined by the institution, plus an allowance for books, supplies, and transportation required by the course of study. Attendance costs do **not** include paying room (housing), board (food), or dependent childcare.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

(Student loans)

11.2 Title IV student loan or grant amounts beyond attendance costs should be considered as income when figuring WIC program eligibility.

11.3 Title IV financial assistance includes: Pell Grants, Supplemental Educational Opportunity Grant (SEOG), College Work-Study, Perkins Loans, Stafford Loans, and PLUS Loans/Supplemental Loans for Students.

EXAMPLE: Julie Rose is getting a \$5,000 PLUS Loan for attending college. Her tuition is \$3,000, books \$500, and transportation to and from school \$500, for a total of \$4,000. The portion of the loan counted as income in determining her eligibility for WIC is \$1,000 (\$5,000 - \$4,000 attendance costs = \$1,000 income).

Student aid

11.4 Any other type of student financial assistance provided directly to the individual is considered income.

Farms and self-employment

12.0 Net income is gross income minus business-related expenses, such as those deducted when filling out a 1040 tax form. The applicant's most recent completed tax return can indicate net income, but because conditions in farming and self-employment may change rapidly, you should update that information with the applicant's best estimate if s/he feels this year's income will be significantly different.

The intent is to exclude business and farm expenses from income counted for WIC eligibility.

EXAMPLE: Sue Meers has started her own beauty shop, which generates \$1,500 income a month. Sue estimates that the business-related expenses she will report on her 1040 will be about \$500, for rent, supplies, and utilities. Sue's net monthly income, for determining WIC eligibility, is \$1,000 (\$1,500 gross income - \$500 business-related expense).

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

Payments made by the military 13.0 Follow the guidance below for payments made by the military.

Payments made by the military for housing 13.1 Any payment received directly by an applicant or participant employed by the military to cover on- or off-base housing is **not** counted as income when determining WIC eligibility in Oregon. Federal regulations give states the option to not include this kind of allowance as income, so some states count it and some do not. Oregon does not.

Payments made directly to a service man or woman and appearing on the employee's Leave and Earnings Statement (LES) as Basic Allowance for Housing (BAH) or Basic Allowance for Quarters (BAQ) is not counted as income when determining WIC eligibility in Oregon.

EXAMPLE: The army pays Margaret Hoolihan \$1,950 a month. This check includes \$450 per month for housing because she lives off-base. This \$450 appears in her pay check each month and is listed on the LES as BAH. The income used in determining Ms. Hoolihan's WIC eligibility is \$1,500 (\$1,950 less \$450 housing allowance).

Payments made by the military for combat pay 13.2 Any combat pay received directly by an applicant or participant employed by the military while serving in an area that has been designated as a combat zone is **not** counted as income when determining WIC eligibility.

13.2.1 This only applies to combat pay that is received during the time the service member is deployed to a combat zone.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

One time payments made by the military

13.3 For service members receiving one time bonus or clothing allowances consider income averaging for the year.

What Military Pay or Allowance Does Count	What Military Pay or Allowance Does Not Count
<ul style="list-style-type: none"> • Base pay – the soldier’s regular rate of pay • Basic Allowance for Subsistence (BAS) • Foreign Language Pay (FLP) • Family Separation Allowance (FSA) • Jump Pay, Dive Pay, Sea Pay, Flight Pay, etc. (unless service member is deployed to a combat zone) • Clothing Maintenance Allowance (CMA) – can be averaged for the year. • Bonus Pay (Bonus) – can be averaged for the year. • Continental United States Cost of Living Allowance (CONUS COLA) 	<ul style="list-style-type: none"> • Basic Allowance for Housing (BAH or BAQ) • Family Separation Housing (FSH) • Overseas Housing Allowance (OHA) • Overseas Continent United States Cost of Living Allowance (OCONUS COLA) • Combat pay as a result of the service member being deployed to a declared combat zone. (May be Imminent Danger Pay or Hazardous Duty Pay (HZD Pay)) This website gives items that are considered combat pay.

Lump sum payments as income

14.0 Apply the following guidelines when determining how to treat lump sum payments for WIC income eligibility.

- 14.1 **Do not count** as income lump sum payments that represent reimbursements for lost or damaged property or payments for medical bills resulting from an accident or injury.
- 14.2 **Count** as income lump sum payments that represent new money intended for income such as gifts, inheritances, lottery winnings, workman’s compensation for lost income, and severance pay. In most cases, the lump sum should be counted as a part of the household’s annual income, or divided by twelve to estimate a monthly income.
- 14.3 If the lump sum payment does not clearly represent either reimbursement or new money, then ask the applicant to declare what portion of the payment is a reimbursement and what portion is new income. The portion that is declared as new money will be counted as income.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

- 15.0 Refer to Appendix B for specific financial resources which are excluded from WIC household income calculations.

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What Is Included as Income

Income **includes** the following:

- a. Payment received for services including wages, salary, commissions, or fees, and overtime where applicable.
- b. Disability payments including L & I payments.
- c. Social security benefits, including SSI payments for disabled individuals.
- d. Dividends or interest on savings, bonds, estates, or trusts; or net rental income.
- e. Temporary Assistance to Needy Families payments.
- f. Unemployment compensation.
- g. Government civilian employee or military or veteran's payments.
- h. Payouts from private pensions or annuities.
- i. Alimony or child support payments.
- j. Regular contributions from persons not living in the household.
- k. Net royalties.
- l. Other cash income which includes, but is not limited to, cash amounts received or withdrawn from any source, including savings, investments, trust accounts, and other resources which are readily available to the family.
- m. Lump sum payments that represent new income such as gifts, inheritance, lottery winnings, workman's compensation for lost income and severance pay. (Refer to Lump Sum Payments on ¶5.13 of this policy.
- n. Cash amounts withdrawn from Indian Trust Funds.
- o. Student loans and grants in excess of attendance costs. Attendance costs are regular tuition and fees for students carrying at least a half-time workload as determined by the institution, and an allowance for books, supplies, and transportation required by the course of study.
- p. All private student grants or scholarships.
- q. Military cash allowances for uniforms and food.
- r. Net income from farm and non-farm self employment.

What is Not Included as Income

Income does **not include** the following:

- a. Federal student loans and grants used for tuition, student fees, the costs for rental or purchase of any required equipment, materials or supplies, books, transportation and miscellaneous personal expenses for a student attending the institution on at least a half-time basis. Following are examples of student loans and grants that are not counted as income:
 1. Pell Grant
 2. Supplemental Educational Opportunity Grant (SEOG)
 3. State Student Incentive Grants
 4. National Direct Student Loans
 5. Stafford Loans
 6. Perkins Loans
 7. PLUS
 8. Supplemental Loans for Students
 9. College Work Study
 10. Byrd Honor Scholarships
- b. Payments or allowances received from the Low-Income Home Energy Assistance Act of 1980.
- c. Military Basic Allowance for Housing or Cost of living allowances for service members living outside of the contiguous states of the U.S.
- d. In-kind housing or other in-kind benefits and payments (e.g. free room in exchange for baby sitting, military on-base housing and medical services).
- e. The value of benefits received through the Farmers' Market Nutrition Program.
- f. The value of assistance to children or their families from the following programs:
 1. School Lunch Program
 2. Summer Food Service Program
 3. Child and Adult Care Food Program
 4. Special Milk Program
 5. School Breakfast Program
 6. Supplemental Nutrition Assistance Program (SNAP)
 7. Food Distribution Program on Indian Reservations (FDPIR)
 8. Food Bank Programs

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

What is Not Included as Income, *cont.*

- g. Any child care payments from the following programs:
 - 1. TANF Child Care Program
 - 2. Title IV-A Child Care Program
 - 3. JOBS Child Care Program
 - 4. At-Risk Child Care Programs (Sec. 402 of Social Security Act, or Section 5081 of Public Law 101-508)
 - 5. Child Care Development Block Grant
- h. 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. Refer to pages 613.5 and 613.6, ¶14.0 of this policy.
- i. Earned Income Credit (EIC), a tax credit for families who work and have children.
- j. Payments received under the Job Training Partnership Act from the following programs:
 - 1. Adult and Youth Training Programs
 - 2. Summer Youth Employment and Training Programs
 - 3. Dislocated Worker Programs
 - 4. Programs for Native Americans
 - 5. Migrant Seasonal Farm-workers Program
 - 6. Veterans Employment Programs
 - 7. Job Corps
- k. Payments received under the Alaskan Native Claims Settlement Act.
- l. Income derived from certain sub-marginal land of the United States that is held in trust for certain Indian tribes.
- m. Any payments to volunteers under Title I and Title II of the Domestic Volunteer Service Act of 1973 (VISTA, Retired Senior Volunteer Program, foster grandparents, Senior Companions Program, and others) or the Small Business Act.
- n. Payments to volunteers under Section 8 of the Small Business Act (SCORE and ACE).
- o. Payments under the Disaster Relief Act of 1974, as amended by the Disaster Relief and Emergency Assistance Amendments of 1989.
- p. Payments related to federal education assistance as follows: payments received under the Carl D. Perkins Vocational Education Act and the Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990; mandatory salary reduction amount for military service personnel to fund the G.I. Bill.
- q. Payments received due to the Agent Orange Compensation Exclusion Act.

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

What is Not Included as Income, *cont.*

- r. Payments received from Wartime Relocation of Civilians under the Civil Liberties Act of 1988.
- s. Reimbursements from the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.
- t. Payments received under the Old Age Assistance Claims Settlement Act, except for per capita shares in the excess of \$2,000.
- u. Payments received under the Judgment Award Authorization Act.
- v. Payments received under the Veteran's Educational Assistance Act of 1984 (GI Bill) as amended.
- w. Payments received under the Cranston-Gonzales National Affordable Housing Act, unless the family's income equals or exceeds 80% of the median income of the area (see box below).
- x. Payments received under the Housing and Community Development Act of 1987, unless the family's income increases at any time higher than 50% of the median income of the area (see box below).

The "median income of the area" is determined by the Housing and Urban Development (HUD) agency. All recipients of payments under the Cranston- Gonzales National Affordable Housing Act and the Housing and Community Development Act of 1987 have incomes below 80% and 50% of the area, respectively. Therefore, these payments would not be counted as income for WIC eligibility purposes. Federal law requires that this information be stated in the WIC Program Manual.

- y. Federal compensation to the following Native American groups: Warm Springs Tribe (Judgment Award Authorization Act funds up to \$2,000 maximum per payment); Yakima Indian Nation (Indian Claims Commission Payment); Apache Tribe of the Mescalero Reservation (Indian Claims Commission Payment); Navajo and Hopi Tribe (relocation assistance); Blackfeet, Grosventre, and Assiniboine Tribes (Montana); Papago Tribe (a.k.a. Tohono O'odham Nation, Arizona); Chippewas: Mississippi, Michigan, Red Lake, Saginaw, Turtle Mountain; Sac and Fox Indian (claims agreement); Passamaquoddy Tribe and Penobscot Nation (Maine Indian Claims Settlement Act, 1980); and Ottawa Indians, Grand River Band. Payments received under the Judgment Award Authorization Act, or income from submarginal U.S. land held in trust for certain Indian tribes.
- z. Short-term, non-secured loans to which the applicant does not have constant or unlimited access.
- aa. Payments received by property owners under the National Flood Insurance Program (Pub. L. 109-64)

INCOME ELIGIBILITY: WHAT COUNTS AS INCOME, *cont.*

What is Not Included as Income, *cont.*

bb. Any subsidy that a household receives through the Medicare/Medicaid prescription drug discount card program.

cc. Payments from the Filipino Veterans Equity Compensation Fund (Pub. L. 111-5)



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

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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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SECTION: Certification 616
SUBJECT: UNAVAILABLE PROOFS
DATE: July 1, 2016 (*revised, released pending USDA approval*)

POLICY: WIC applicants and participants (women, infants and children) who are unable to provide the required proofs at enrollment or recertification appointments will be given a 30 day grace period in which to provide the proofs needed to participate in WIC. If providing proofs presents an unreasonable barrier WIC applicants may complete a “No Proof Form” documenting the reason.

PURPOSE: To avoid barriers to service, WIC applicants and participants may receive one month of benefits and have 30 days to bring in required proofs or complete a “No Proof Form” in order to continue receiving WIC benefits.

RELEVANT REGULATIONS: 7 CFR §246.7 ¶(c)(2)(i)—Proof of Residency and Identity
7 CFR 246.7 (d)(2)(v)-Income Eligibility Documentation
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: ♦426—Record Retention Period
♦450—Confidentiality
♦610—Required Proofs: Identity, Residency, Income
♦611—Income Eligibility: Determining Income Eligibility
♦612—Income Eligibility: Adjunctive or Automatic Eligibility

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 102, Enrollment
Chapter 3, Lesson 801, Reactivate and Reinstate

DEFINITIONS: *Acceptable proof* Reasonable documentation of personal identity, income and current residency as approved by the state WIC program.

Individual An applicant or a participant.

PROCEDURE:

Unavailable proofs 1.0 An applicant or participant who does not have one of the required proofs at the time of the enrollment appointment must be assessed for eligibility, and then either marked in TWIST as “Eligibility Pending” with 30 days to bring in proof, have a “No Proof Form” (57-633) completed and on file or identify the barrier to bringing in proof and have a completed “No Proof Form” on file.

UNAVAILABLE PROOFS, *Cont.*

- (Unavailable proofs)*
- 1.1 The “No Proof Form” can be downloaded from the Clinic Forms page of the Oregon WIC website:
<http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Pages/clinicforms.aspx>
- Eligibility pending*
- 2.0 If the individual has acceptable proof available but did not bring it to their appointment, assess their self-reported income, current residence, or potential proof of identity. This information must be documented on the “No Proof Form”.
- 30 day grace period*
- 2.1 Both the applicant/participant and a WIC staff person must date and sign the form declaring that the information given is accurate and will be presented at the WIC office within 30 days.
- 2.2 Mark “Eligibility Pending” in TWIST. (See TWIST Training Manual Chapter 3, Lesson 102, Enrollment)
- 2.3 Make sure the individual understands that they have 30 days to bring in the missing proof(s) and that the participant will be removed from the program if they fail to bring in the acceptable proof needed by the given date or if the information provided shows them to be over the WIC income standards. Local agencies are not required to provide any further written communication about missing proofs.
- 2.3.1 Verbally inform the applicant or provide written instructions on the 30-day grace period at the initial meeting. Include the income guideline, the date by which the individual has to return to the clinic with acceptable proof, and an explanation that program eligibility cannot be finalized until the individual brings in the required proof.
- 2.4 If eligibility is pending, issue one month of benefits and an eWIC card. Continue to provide WIC services during the 30 day grace period. Schedule the participant for a time to issue benefits the following month and ask them to bring in their proofs at that time.
- 2.5 When the missing proof is brought in and documented in TWIST, remove “Eligibility Pending.” The individual will continue to receive benefits for the remainder of their certification period, which started the month benefits were initially provided.
- 2.5.1 Terminate services if the information provided by the applicant shows they are over the WIC income limit.
- Failure to bring in acceptable proof*
- 2.6 If an individual fails to submit the required proof(s) within the 30 day grace period, they will be terminated automatically from the program and will not receive any more benefits. No written notification will be provided. The individual is not required to pay back the benefits received for the initial month.

UNAVAILABLE PROOFS, *Cont.*

- Reactivation* 2.7 If an individual was terminated from the program for failure to bring in acceptable proof within the grace period but later returns with the acceptable proof, reactivate the individual for the remainder of the certification period using the “Reactivate” transaction type in TWIST. See TWIST Training Manual Chapter 3, Lesson 801, Reactivate and Reinstate. Benefits will be issued from the current month forward. Benefits will not be issued for previous months when eligibility was pending.
- 2.8 If an individual who has been removed later returns stating they cannot provide the acceptable proofs because of special situations, have the individual fill out and sign the “*No Proof Form*” and document the reason. Reactivate the individual and issue the appropriate benefits.
- 30-day grace period not allowed* 2.9 Proof of adjunct income eligibility must be determined at the time of enrollment. 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 ♦611—Income Eligibility: Determining Income Eligibility, for guidelines on how to proceed if the individual is not adjunctively eligible.
- Proof not available* 3.0 If an individual indicates that they cannot provide an acceptable form of the required proofs due to a special situation, complete the “*No Proof Form*” (form 57-633).
- 3.1 Carefully assess why the individual is unable to provide proof. If staff determines the individual presents a special situation (as described in ¶3.3) and that requiring the individual to provide proof would present an unreasonable barrier to participation, allow individual to self-declare and complete the “*No Proof Form*”.
- Ask questions* 3.2 Ask questions to determine if the participant is able to provide the requested proof, or if the “*No Proof Form*” is needed.
- Examples of questions to ask* 3.2.1 Questions to ask the individual may include but are not limited to the following:
- Do you have documents showing acceptable proof?
 - Do you know what kind of documents you need to show us?
 - Are you able to return to the clinic with the required proof of income within 30 days?
 - Are there any barriers that would prevent you from bringing in the proof within the next 30-days?

UNAVAILABLE PROOFS, Cont.

<i>Examples of special situations</i>	3.3	Special situations may include but are not limited to: <ul style="list-style-type: none">• theft• disaster• homelessness• migrant status• domestic violence• zero income reported• family members work for cash
<i>Documentation</i>	3.4	Local program staff must document on the form the reason(s) why proof is not available. Both the applicant/participant and a WIC staff person must date and sign the form declaring that the information given is accurate. 3.4.1 A new form must be completed for each certification period, even if the reason proof is unavailable has not changed.
	3.5	Document in TWIST that no proof is available and that a “No Proof Form” has been completed. Then issue benefits as usual. No further follow up is necessary.
<i>Record retention</i>	4.0	Local programs may keep aggregate files for the “ <i>No Proof Form</i> ” and must retain these forms according to 426—Record Retention Period.
<i>Submitting proofs</i>	5.0	Proofs may be submitted to the clinic within the 30 day grace period via fax, mail, email, or text if the applicant cannot bring them in. Local programs may accept documents for one of the proofs from an individual, an employer or other health and social services agencies.
<i>Overcoming barriers</i>	5.1	These methods are helpful when overcoming barriers such as a disabled individual who is physically unable to return to the clinic, an individual who has an infectious disease, or an individual with no mode of transportation and living in an area with no access to the mass transit system.
<i>Confidentiality</i>	5.2	If agencies choose to accept proofs via fax, mail, email or text, they must take steps to ensure that information submitted via these methods is kept confidential. Agencies should work within their organization to determine how best to limit the risk of identity theft or breach of confidentiality. 5.2.1 Agencies should consider setting up a secure email or text system. 5.2.2 All proofs submitted with information about an applicant or participant must be treated with the same rules of confidentiality as the original documents. Please refer to ♦450—Confidentiality, for more information.

UNAVAILABLE PROOFS, *Cont.*

(Confidentiality)

- 5.2.3 Any proofs submitted via fax or mail should be documented in TWIST and then shredded.
- 5.2.4 Any proofs submitted via email or text should be documented in TWIST and then the email or text deleted.

Reviewing proofs

5.3 Proofs received via fax, mail, email or text must meet the same criteria and include the same information as proofs reviewed in person

Inform the individual

5.4 At the time of initial contact, inform the applicant or participant of potential problems with submitting proofs if the individual decides to mail, fax, email, or text any information to the clinic, such as:

Potential problems

- lack of confidentiality;
- Potential for identity theft if email or text is insecure
- problems matching proofs submitted this way with a specific individual;
- potential for miscommunication (mail or faxes may not get to the right staff member);
- lack of communication between the individual and the WIC program;
- Proofs may not be legible or are missing key information;
- potential for falsifying documents and faxing forged documents; and,
- lost in the mail, shuttles or office routing process.

EXAMPLE: An employer faxed the monthly income information of the boyfriend of the mother of a child who is applying or participating in WIC. When the fax arrives at the clinic, clinic staff may find it impossible to match the name of the employee (boyfriend) to the appropriate applicant or participant (child) because the name on the fax document is different from the child.

The mother of the child assumes that since proof has been faxed to the WIC clinic, no further action is needed and her child will continue to be on WIC. However, since clinic staff is not able to match the proof to that child, TWIST automatically terminates the child from WIC.

Informing the applicant

5.5 Provide the individual with the clinic's fax number, address and the name of the staff person to whom it should be addressed, email address, or phone number that will accept text messages.

5.5.1 If mailing documents, advise the individual to mail *copies* of the original documents to the clinic.

UNAVAILABLE PROOFS, Cont.

*(Informing the
applicant)*

- 5.5.2 Make sure the individual understands the 30 grace period still applies.
- 5.5.3 If local program staff do not receive any fax transmittals or mailed documents verifying the missing proofs within 30 days, the person will be terminated from the program.

*Local Agency
Internal policy*

- 5.6 The state WIC program recommends local programs that allow proofs submitted via fax, mail, email, or text have an internal policy and procedure for receiving and processing proof documents received with guidance to manage or reduce potential problems and issues. ★

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SECTION: Certification
SUBJECT: **PROVIDING WIC SERVICES DURING HOME VISITS**
DATE: June 1, 2016 (*revised*)

621

POLICY: WIC services provided during home visits will meet the same criteria as activities that take place in the WIC clinic.

PURPOSE: To assure that WIC services are delivered appropriately when completed outside of the WIC clinic setting.

RELEVANT REGULATIONS: §246.7 ¶—Certification of participants

- OREGON WIC PPM REFERENCES:**
- ◆440—Staff Training Requirements
 - ◆510e—eWIC Cardholder Requirements
 - ◆595e—Separation of Duties
 - ◆600—Certification Introduction and Overview
 - ◆610e—Required Proofs – Identity, Residency, Income
 - ◆611—Income Eligibility: Determining Income Eligibility
 - ◆620e—Certification and Issuing Benefits to Co-workers, Relatives and Friends
 - ◆625—Nutrition Risk Assessment
 - ◆635e—Participant Notification: Eligibility and Rights & Responsibilities
 - ◆640—Documentation Requirements for Certification in TWIST
 - ◆641—Documentation Requirements for Certification in the Absence of TWIST
 - ◆660—Competent Professional Authority (CPA): Requirements
 - ◆661—Competent Professional Authority (CPA): Appropriate Counseling for Risk Levels
 - ◆670— Overview of Risk Criteria and Priority Levels
 - ◆713— Breastfeeding: Use of Supplemental Formula
 - ◆810—Nutrition Education: Making Nutrition Education Available
 - ◆820—Nutrition Education: Participant Contacts
 - ◆821—Nutrition Education: Telephone Contacts for High Risk Participants with the RD
 - ◆830—Nutrition Education: Documentation
 - ◆885— Other Referrals: Required and Recommended.

DEFINITIONS: *Home visit* Delivery of services to an individual in the residence of that individual.

BACKGROUND: A number of health department programs deliver services in the home. Incorporating WIC certifications and follow up activities into these visits can be convenient for participants and support the work of visiting staff.

Providing WIC Services During Home Visits, *cont.*

PROCEDURE:

- | | | |
|---------------------------------|-----|---|
| <i>Certification criteria</i> | 1.0 | Local WIC agencies must follow WIC program requirements, policies and procedures as described in USDA regulations and the Oregon Policy and Procedure manual regardless of the location where the services are delivered. See ♦ 600—Certification Introduction and Overview. |
| <i>Non WIC staff</i> | 1.1 | Certifications must be completed by a qualified Competent Professional Authority (CPA). See ♦660—CPA requirements. Health professionals who are non WIC staff and who meet CPA qualifications may conduct certifications in a participant’s home once the required CPA training modules have been completed. Health professionals may test out of required training modules as determined appropriate by the local agency training supervisor. Non WIC health professionals may provide second nutrition education contacts in the home without meeting full CPA requirements. See ♦440—Staff Training Requirements. |
| <i>Proofs</i> | 1.2 | When a certification is completed during a home visit, proof of income, identity and residency must be screened in the same manner as when the certification is completed in the WIC clinic. See ♦610e—Required Proofs and ♦611—Determining Income Eligibility. |
| <i>Participant notification</i> | 1.3 | Applicants, participants or caretakers must be informed of their rights and responsibilities during home certifications. A copy of “ <i>My Rights and Responsibilities</i> ” needs to be offered at each certification before the “ <i>Participant Signature Form</i> ” signed and dated to indicate receipt and agreement with the information provided. Completed signature forms must be returned to the WIC clinic for the required retention period. See ♦635— Participant Notification: Eligibility and Rights & Responsibilities. |
| <i>Risk assessment</i> | 1.4 | Participants must be screened for nutrition risk prior to receiving benefits. Accurate and complete anthropometric, biochemical, dietary, and health information must be gathered by home visiting staff for evaluation. Data from health care providers can be used to avoid duplication of medical procedures. See ♦625—Nutrition Risk Assessment and ♦670—Overview of Risk Criteria and Priority Levels. |
| <i>High risk referral</i> | 1.5 | High risk participants must be referred to the RD/WIC Nutritionist for at least one contact per certification period. See ♦661—CPA: Appropriate Counseling for Risk Levels. Telephone contacts by the RD may be used to provide second nutrition education to high risk participants who are receiving services in the home and are unable to come to the WIC clinic due to medical reasons. ♦821—Nutrition Education: Telephone Contacts for High Risk Participants with the RD. It is recommended that consultation with the RD occur for all high risk participants who receive services in the home to assure appropriate coordination of care. |

Providing WIC Services During Home Visits, cont.

- Nutrition education* 1.6 Nutrition education must be offered during the home certification process. The nutrition education provided should match the participant's need and interests. See ♦820—Nutrition Education: Participant Contacts. Home visits where nutrition education and follow up are provided during a certification period may be counted as second nutrition education contacts. See ♦810—Nutrition Education: Making Nutrition Education Available.
- Referrals* 1.7 Mandatory referrals to OHP will be made when certifications are completed in the home. All referrals that are made need to be documented in TWIST. See ♦ 885—Other Referrals: Required and Recommended.
- Documentation* 2.0 Documentation of services provided during home visits must be entered into the participant's record in TWIST. Data entry and benefit issuance should be completed within 48 hours of the visit. Information may be gathered electronically and entered directly into TWIST on site or gathered manually by using a form such as Certification Data Entry document (see http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Documents/615_cert_ded.pdf) or an alternate form developed by the local agency. Documentation requirements for home visits are the same as contacts that occur in the WIC clinic. See ♦640—Documentation Requirements for Certification in TWIST and ♦641—Documentation Requirements for Certification in the absence of TWIST.
- 2.1 The participant's record must reflect the date of the contact, who conducted the visit and who entered the data if data entry is completed by someone other than the staff who conducted the visit. See ♦ 830—Nutrition Education: Documentation.
- Benefit Issuance* 3.0 Benefits may not be issued until the certification or second nutrition education contact in the home has been completed and entered into TWIST. A staff member other than the home visitor who conducted the certification needs to issue benefits to assure separation of duties. See ♦595e—Separation of Duties.
- 3.1 Home visiting staff may not take on the role of cardholder for a WIC participant. In the situation where the participant is a friend or family member of the home visitor, WIC services may not be provided by the visiting staff. See ♦620e—Certification and Issuing Benefits to Co-workers, Relatives and Friends.
- 3.2 At least one cardholder must be identified and shopper education must be provided when benefits are issued. Shopper information and eWIC card(s) may be provided during the home visit by visiting staff or in the WIC clinic by WIC staff. The initial issuance of eWIC cards for the first and second cardholder must be provided in person. eWIC cards may not be mailed. See ♦510—eWIC Cardholder Requirements and ♦635—Participant Notification: Eligibility and Rights & Responsibilities.

Providing WIC Services During Home Visits, cont.

- 3.3 Issuance of formula is not allowed for breastfeeding infants less than one month of age. Review ♦713— Breastfeeding: Use of Supplemental Formula for guidance on supporting breastfeeding mothers who request formula.

Written Procedure 4.0 A written local agency procedure policy is required to identify procedures for providing WIC services in the home when this option is made available by the local agency. The procedure must address the following items:

- How will home visits be scheduled?
- Who will conduct home visits?
- Who will assure that home visitors are appropriately trained?
- Who will assure that home visitors receive appropriate updates on policies or procedures?
- How will visit documentation be entered into TWIST?
- How will RD referrals and follow up be handled?
- How will future appointments be identified?
- How will benefit and eWIC card issuance occur?
- How will participants be notified that their benefits have been issued?

★

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SECTION: Certification 652
SUBJECT: **WIC Transfer Card and WIC Overseas Program**
DATE: June 1, 2016 (*revised*)

POLICY: The local program shall issue a WIC transfer card to every participant who is likely to relocate outside of Oregon.

PURPOSE: To ensure that WIC participants who relocate outside of Oregon during a valid certification period have a means to verify program enrollment and continue program benefits for the duration of their certification without inconvenience or undue delay. To provide guidelines for accepting a valid WIC Overseas Program VOC card.

RELEVANT REGULATIONS: 7 CFR §246.7 ¶(k)(1)(3)(4)—Transfer of certification
 7 CFR §246.7 ¶(d) (ix)—Income eligibility determination for instream migrant farmworkers
 FNS Instructions, 803-11, Rev 1, December 1988 Revision, Verification of Certification Cards
 ASM 01-39—Department of Defense Overseas Program
 ASM 02-17 DHHS Regulations to Implement HIPPA and Applicability to WIC Program

OREGON WIC PPM REFERENCES: ♦425—Ordering State-Produced Materials
 ♦450—Confidentiality
 ♦475—Waiting List
 ♦612—Income Eligibility: Adjunct or Automatic Income Eligibility
 ♦653—Participant Transfers Into and Out of State
 ♦654—Participant Transfers Within State
 ♦657—Migrant Workers

TWIST TRAINING MANUAL REFERENCES: Chapter 3, Lesson 804, Transfers

APPENDICES: 652.6 Appendix A Sample of WIC transfer card
 652.7 Appendix B Sample of DoD WIC Overseas Program Participant Profile Report/VOC card

DEFINITIONS: *Instream migrant* A migrant farmworker or family member who comes into a clinic service area with the harvest stream and leaves the clinic service area, often mid-certification, for employment in the harvest of other crops or to return to her/his home base.

Migrant farmworker An individual whose principal employment is in seasonal agriculture, who has been so employed in the last 24 months, and who establishes, because of that employment, a temporary abode.

WIC Transfer Card and WIC Overseas Program, *cont.*

(DEFINITIONS:)	<i>Participant Profile Report /VOC Card</i>	The Department of Defense (DOD) WIC Overseas Program verification of certification (VOC) card which also serves as a participant profile report.
	<i>WIC Overseas Program</i>	An overseas program like WIC implemented by the Department of Defense using DoD funds for members and dependents of active duty military personnel, civilian employees and contractors of the DoD living overseas, who are eligible for WIC.
	<i>WIC transfer card</i>	A card verifying current eligibility which is issued to every participating member of a migrant farmworker family and to any WIC participant who is likely to move outside Oregon during their certification period. This is also sometimes called a verification of certification (VOC) card.
	<i>TWIST</i>	The Oregon WIC program's data system: The WIC Information System Tracker.

BACKGROUND: The requirement for WIC transfer cards was initially intended to ensure that WIC participants who were members of migrant farmworker families would be able to receive program benefits in a new location without inconvenience. The increasing number of transient and homeless persons who are eligible for WIC continues to make the WIC transfer card an essential aspect of program operations.

The Oregon WIC program automated data system (TWIST) allows local programs to identify WIC participation on a statewide basis. For this reason, it is not necessary for local programs to issue WIC transfer cards to participants who relocate **within** the state. See ♦654—Participant Transfers Within State for instructions on transferring participants within Oregon. Participants who move into or outside Oregon are not covered by this automated data system and still need the tangible WIC transfer card in order to ensure continued participation. See ♦653—Participant Transfers Into and Out of State for instructions on transferring participants into and out of the state of Oregon.

WIC Overseas Program In 2001, the Department of Defense began offering the WIC Overseas Program for eligible individuals who are members or dependents of active duty military personnel, civilian employees and contractors of DoD stationed overseas.

PROCEDURE:

- When to issue WIC transfer card*
- 1.0 Local programs are required to issue WIC transfer cards to WIC participants in the following groups:
- Members of a migrant farmworker family.
 - Members of a homeless family.

WIC Transfer Card and WIC Overseas Program, *cont.*

(When to issue WIC transfer card)

- Any current participant who indicates at any time that they may move out of state during their current certification period.
- WIC participants affiliated with the military who will be transferred overseas.

Completing a WIC transfer card

- 2.0 An individual transfer card should be printed for each participant. Local program staff and the participant or the participant's parent/guardian must sign the transfer card. The WIC transfer card will automatically include all of the essential elements required for the card to be accepted as valid by the receiving WIC program. For more information on printing transfer cards, refer to the TWIST Training Manual, Chapter 3, Lesson 804--Transfers.

Transfer cards for WIC Overseas Program

- 3.0 WIC participants affiliated with the military who are transferred overseas and meet eligibility requirements are eligible to participate in the WIC Overseas Program until the end of their certification period.

Local program responsibilities

- 3.1 Issue WIC transfer cards to individuals affiliated with the military who are transferring overseas for continued benefits.
- 3.2 Inform participants that:
- There is no guarantee that the WIC Overseas Program will be operational at the overseas site where they will be transferred;
 - By law only certain individuals are eligible for the WIC Overseas Program;
 - Issuance of a WIC transfer card does not guarantee continued eligibility and participation in the WIC Overseas Program; and
 - Eligibility for the WIC Overseas Program will be determined at the overseas WIC service site. (Local WIC program staff are not responsible for screening and determining eligibility for the WIC Overseas Program.)

Participant education

- 4.0 Give the completed WIC transfer card to participants who are likely to relocate outside of Oregon. Include the following information:
- 4.1 Provide the name, address, and telephone number of the program serving the area to which the individual is moving, if known.
- 4.1.1 Contact information for other state WIC programs in the US can be found on the National WIC Association website at <http://www.nwica.org>.
- 4.2 Instruct the individual to present the WIC transfer card to the local WIC program in her/his new location.
- 4.3 Remind the individual to safeguard the WIC transfer card since it verifies proof of entitlement to WIC services.

WIC Transfer Card and WIC Overseas Program, *cont.*

- (Participant education)**
- 4.4 Inform the individual that immediate enrollment in the new local program may not occur if it is at maximum caseload.
- 4.4.1 In this circumstance, the transferring participant will be placed at the top of the waiting list, but will not receive program benefits until space becomes available. Refer to ♦475—Waiting List for more information.
- Transferring overseas**
- 4.5 For WIC participants affiliated with the military who are transferring overseas, refer them to the DoD’s WIC Overseas Program information on the TRICARE website at <http://www.tricare.mil/wic/>.
- Acceptance of WIC transfer/VOC cards**
- 5.0 Local programs must accept valid WIC transfer cards and WIC Overseas Program VOC cards presented at a WIC clinic by participants moving into Oregon.
- 5.1 At a minimum, the transfer card must show the following essential elements:
- Participant name(s)
 - Date the participant was certified
 - Date that the current certification period expires
- 5.1.1 Treat a WIC Overseas Program participant with a transfer card showing these three essential elements just as if the individual presents a transfer card which contains all the required elements.
- 5.2 Check for proof of residency and identity of the individual presenting the valid transfer/VOC card.
- 5.3 Provide continued WIC benefits to the participant until the end of the individual’s certification period if your program is not at its maximum caseload and does not have a waiting list. (Refer to ♦653—Participant Transfers Into and Out of State for detailed guidelines.)
- Waiting list priority**
- 5.4 If your program is at its maximum caseload and has established a waiting list, place the transferring WIC participant on the waiting list ahead of all waiting applicants regardless of the priority of their nutrition risk criteria. Refer to ♦475—Waiting List.
- 5.4.1 Refer to page 652.10 for a sample of the DoD’s WIC Overseas Program Participant Profile Report/Verification of Certification Card (VOC).
- 5.4.2 For a list of WIC Overseas Program contacts visit: <http://www.tricare.mil/wic/>

WIC Transfer Card and WIC Overseas Program, *cont.*

Mailing WIC transfer cards to other WIC programs

6.0 Participants may request a WIC transfer card after they have already moved. Upon receipt of a verbal or written request, the local program must forward a completed WIC transfer card to the new local WIC program. To reduce barriers to the transferring participant, make every effort to respond to the request in a timely manner.

6.1 The essential information on a WIC transfer card may be released without a written authorization from the participant. Refer to ♦450—Confidentiality for guidelines on release of information.

Mailing to participants

6.2 You may send a WIC transfer card directly to the participant **only** in situations when it does not seem practical to send it to the new WIC program or when the program location is unknown. The local program must take reasonable steps to confirm the identity of the individual and must mail the WIC transfer card in a DO NOT FORWARD envelope.

EXAMPLE: Participant Jane Doe calls the local program to inform them that she has left the state of Oregon. She is staying in a shelter home temporarily and is not sure where she will settle in her new state. The local program questions Jane to confirm her identity:

- What are the names of your children on WIC?
- What is your birthday?
- What are your children's birthdays?
- What was your last address in Oregon?

6.3 After you have confirmed the individual's identity, mail or FAX the completed WIC transfer card. ★

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Sample

**State of Oregon WIC Program
WIC Transfer Card**

DATE: 05/23/2011

Participant Name: Veronica Vida

WIC ID Number: 00753056-01

Date of Birth: 2/12/2009

Date Income Last Determined: 3/3/2011

Date of Certification: 3/3/2011

Date Certification Period Ends: 8/31/2011

EDD:

Height: 31' 0/8"

Weight: 23lbs 0oz

Height/Weight Collection Date: 03/03/2011

Hematocrit (HCT): 31.00

Hemoglobin (HGB):

HCT/HGB Collection Date: 03/03/2011

Nutritional Risks (written description):

MONITOR GROWTH PATTERN (< OR = TO 10TH% HT/AGE)

MONITOR VEGETABLE INTAKE

MONITOR MILK INTAKE

Date of Last Food Instrument Issuance:

Local Agency Name/Number: Ford/57

Local Agency Address: 12 HEALTH DEPT AVE.
FORD, OR 97000

Local Agency Telephone:

(503) 111-1002

LA Staff Signature _____

Date _____

Participant Signature _____

WIC Transfer Card and WIC Overseas Program, cont.

Appendix B

SAMPLE SAMPLE SAMPLE SAMPLE SAMPLE

Session Date: _____

Participant's Name: _____

**Department of Defense WIC Overseas Program
Participant Profile Report/Verification of Certification Card (VOC)**

Address 1:		Address 2:	Participant Type:
Gender:	DOB:	Education:	Category:
Marital:		Unit Phone #:	Home Phone:
Participant ID:		Language:	Race/Ethnic:
Spouse/Parent/Guardian Name:			Home Phone:
Address 1:		Address 2:	Unit Phone:
Annual Income:		Primary Source:	Econ. Unit:
Sponsor Name:			Home Phone #:
Sponsor Address 1:		Sponsor Address 2:	Unit Phone #:
Relationship:		UIC:	DEROS:
Authorized Proxy:			
Encounter Type:		WIC Site ID:	Begin Cert Date: End Cert Date:
Height:	Weight:	BMI:	Hematocrit:
Date of Measurement:			
Nutrition Risks:		Priority:	EDD:
Nutrition Education:		Date Provided:	Health Care Source:
Food Prescription ID:			
FI One: xxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	FI Two: xxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	FI Three: xxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxxxxxxxxxxxxxxxx	
Food Instrument Issued for Dates:			
<p>Participant Rights and Obligations: I have been advised of my rights and obligations under the program. I certify that the information I have provided for my eligibility determination is correct, to the best of my knowledge. I understand I have a right to appeal any decision that I disagree with. This certification form is being submitted in connection with receipt of Federal funds. Program officials may verify information on this form. I understand that intentionally making a false or misleading statement or intentionally misrepresenting, concealing or withholding facts may result in paying the State agency, in cash, the value of the food benefits improperly issued to me and may subject me to civil or criminal prosecution under State and Federal law. I hereby certify that I am not currently enrolled in any other WICO or WIC Program. I understand that to do so would be a deliberate misuse of program benefits and could result in loss of these benefits.</p>			
Participant or Parent/Guardian Signature:		Date:	Competent Professional Authority:
Print Name:			



SECTION: Nutrition Services 823
SUBJECT: **NUTRITION EDUCATION: SECOND NUTRITION EDUCATION USING ONLINE LESSONS**
DATE: June 1, 2016 (*revised*)

POLICY: Online lessons may be used to provide second nutrition education (NE) for low and medium risk participants.

PURPOSE: To provide guidance for second nutrition education using online lessons.

RELEVANT REGULATIONS: ASM 06-24—WIC Nutrition Education Guidance

OREGON WIC PPM REFERENCES:

- ◆661—Competent Professional Authority: Appropriate Counseling for Risk Levels
- ◆810 – Nutrition Education: Making Education Available
- ◆820—Nutrition Education: Participant Contacts
- ◆830—Nutrition Education: Documentation

PROCEDURE:

Offering online nutrition education

- 1.0 Online lessons may be offered to low and medium risk participants to meet the needs of participants while still providing an effective second nutrition education contact.
 - 1.1 The WIC CPA will determine if the participant is eligible for online NE and whether it is an appropriate option for that participant or family.
 - 1.2 If online NE is appropriate, the participant will be asked what device will be used to access the online lesson – smartphone/hand-held device or computer/laptop.
 - 1.3 The WIC CPA will explain the process for completing the online lesson on the device selected, including written instructions on how to access the lesson.
 - 1.4 WIC staff will schedule the online lesson into the participant’s record.
 - 1.5 The participant will receive instruction on how and when to contact WIC to report completion of an online lesson.
 - 1.6 When the participant contacts the agency regarding lesson completion, a designated WIC staff member will review with the participant what was learned or what the participant plans to do differently as a result of the lesson. A designated WIC staff member includes any staff who has completed the training necessary to fill this role. See ¶5.0.
 - 1.7 The designated staff member will verify lesson completion electronically by using the look-up feature of the online nutrition provider, or by viewing the participant’s certificate of completion, either in-person or electronically. Participants may provide but are *not* required to provide a certificate of completion.

NUTRITION EDUCATION: SECOND NUTRITION EDUCATION USING ONLINE LESSONS, *cont.*

<i>Issuing benefits</i>	1.8	After the online lesson has been verified and discussed, the designated staff member will issue food benefits for the next month(s) and make the next appointment or appointment request.
	1.9	The designated staff member will document the name of the lesson taken in the participant’s record. See section 4.0 for further details.
<i>Participant eligibility standards</i>	2.0	Participants shall have an interest in online NE, access to an appropriate device for doing online NE lessons, and the ability to read and comprehend English or Spanish.
	2.1	The following participants are potentially eligible for online nutrition education lessons for their second nutrition education contact: <ul style="list-style-type: none">• Parents, foster parents, or caregivers of low or medium risk infants and children.• Low or medium risk pregnant, postpartum or breastfeeding women.
<i>Options for reporting online lesson completion</i>	3.0	Communication must occur between the staff member and the participant to verify lesson completion and to review with the participant what was learned or what the participant plans to do differently as a result of completing the online lesson. Options for communicating with the participant include contact by telephone, text message, electronic mail, or in-person at the clinic site.
<i>Document in participant’s record</i>	4.0	Each completed online NE contact must be documented in the participant’s record. See ♦830—Nutrition Education: Documentation.
	4.1	Ensure that the name of the specific lesson that the participant completed is documented in the participant’s record. Options include using the drop-down menu under NE Topics, adding “show” to a group NE class with that name, or by documenting the name of the lesson and any other relevant information in the Progress Notes.
	4.2	The specific online nutrition lesson may be used only once as a second nutrition contact. The same lesson may not be used multiple times for the same participant. If appropriate, the same lesson may be used for other family members.
<i>Staff training</i>	5.0	WIC staff members involved in verifying online second nutrition contacts must receive training on how to fill this role effectively. At a minimum, training is to include the following elements: <ul style="list-style-type: none">• Knowledge of state policies ♦823, ♦824, ♦830 and ♦835 on the provision of nutrition education.

NUTRITION EDUCATION: SECOND NUTRITION EDUCATION USING ONLINE LESSONS, *cont.*

(Staff training)

- Knowledge of the local agency’s policy and procedures which are to be followed in the provision of online nutrition education.
- Familiarity with the websites of both online nutrition education providers, including the format and topic areas, the names of the lessons available, how to access the lessons, and how to use the look-up features to electronically verify lesson completion for WIC participants.
- Review the content of *at least one lesson per topic area* for each nutrition education provider used by the local agency.
- Knowledge of how to refer the participant to a CPA or health professional in the agency if the participant has questions or requests information outside of the staff member’s scope of practice.

Required local procedure and approval process

- 6.0 Local WIC programs must have a written procedure in place for using online nutrition lessons for second nutrition contacts. This written procedure must be submitted to the state WIC office for review and approval prior to implementation and must be made available during the biennial WIC review. This procedure should include:
- Plan for training staff.
 - How staff will determine if the participant is eligible for online NE.
 - How online NE will be marketed to participants in conjunction with other local program options for second nutrition contacts.
 - How the staff member will provide instructions for accessing the NE lesson, engage the participant in a conversation about it once completed, and how the participant will report lesson completion.
 - How the appointment will be identified in the participant’s record
 - Which local agency staff will assist the participant with proof of lesson completion, follow-up conversation on the lesson content, and answering the participant’s questions about the lesson.
 - Where and how documentation will be made in the participant’s TWIST record, including the date, lesson name, and participant next steps if appropriate.
 - How food benefits will be issued to the participant. ★

- REFERENCES:** 1. Oregon WIC Nutrition Education Guidance:
<http://public.health.oregon.gov/HealthyPeopleFamilies/wic/Documents/nutr-ed/2010-ne-guidance.pdf>

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SECTION: Nutrition Services 835
SUBJECT: NUTRITION EDUCATION: Attendance or Refusal
DATE: June 1, 2016 (*revised*)

POLICY: Food benefit issuance is coordinated with WIC participants' attendance of second nutrition education (NE). The maximum amount of food benefit issuance is three months at one time.

PURPOSE: To encourage participation in nutrition education activities by coordinating food benefit issuance with WIC participants' attendance of second nutrition education. To provide a uniform procedure for issuing WIC food benefits to participants, ensuring adequate NE opportunities.

RELEVANT REGULATIONS: 7 CFR §246.11—Nutrition education
7 CFR §246.12 ¶(d)—Compatibility of food delivery system
7 CFR §246.12 ¶(r)(1)—Parents/caretakers and proxies

OREGON WIC PPM REFERENCES: ♦511—Food Benefit Issuance
♦610—Required Proofs: Identity, Residence, Income
♦810—Nutrition Education: Making Education Available
♦820—Nutrition Education: Participant Contacts

DEFINITIONS:

<i>First Cardholder</i>	The required cardholder for a WIC family Electronic Benefit Account. The first cardholder is either the woman participant or the parent or caretaker from the same household as the infant or child participant therefore sharing the same address. This individual may attend nutrition education appointments, bring in a child for certification appointments and spend WIC food benefits.
<i>Second Cardholder</i>	The optional second cardholder who has been issued their own eWIC card with the permission of the first cardholder. This individual may attend nutrition education appointments, bring in a child for certification appointments and spend WIC food benefits.
<i>Second nutrition education</i>	Group or individual nutrition education occurring on a date after the basic nutrition education provided during the certification visit. See ♦810—Nutrition Education: Making Education Available and ♦820—Nutrition Education: Participant Contacts for clarification on content and frequency of second nutrition education.
<i>Refusal of nutrition education</i>	Participant states unwillingness or inability to attend any nutrition education offered.

NUTRITION EDUCATION: Attendance or Refusal, cont.

PROCEDURE:

- NE attendance* 1.0 First and second cardholders can attend nutrition education activities and be issued food benefits.
- Do not deny food benefits* 2.0 Participants or cardholders shall not be denied food benefits for failure to attend or participate in nutrition education activities.
- Missed NE 2.1 If a participant or cardholder is unable to attend their scheduled nutrition education, reschedule them for another nutrition education appointment within the same month, if possible.
- 2.2 If it is not possible to reschedule them within the same month, allow the participant or cardholder to receive one month's issuance of benefits and reschedule the participant for the second nutrition education activity the following month.
- 2.3 One month's food benefits may be issued in person or over the phone when nutrition education is missed. See ¶4.1 and ¶4.2 of ♦610—Required Proofs: Identity, Residence, Income for verifying cardholder identity over the phone before issuing benefits.
- NE refusal* 3.0 Participants who refuse any second nutrition education offered during the initial or subsequent certifications must contact their WIC clinic either in person or over the phone the month their food benefits end to continue on the program.
- 3.1 WIC staff shall indicate the month the participant needs to contact the clinic on the WIC Benefits List, WIC ID card, or other document. During this contact staff ask if the participant has any questions about spending their food benefits.
- 3.2 Follow your local procedure for frequency of food benefit issuance.
- 3.3 Document "NE Refusal" in the participant's TWIST record.
- 3.4 Local programs are encouraged to offer nutrition education information such as anticipatory guidance to participants who refuse nutrition education. Although this does not meet the definition of a second nutrition education contact, it does support the mission of WIC. ★

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