October 2026
Replaces February 2026

# Adjunctive Eligibility

## Policy

**USDA Federal Regulations:**

**Documentation requirements for adjunct/automatic income eligibility**

246.7(d)(2)(v) Are applicants required to document income eligibility? (A) Adjunctively/automatically income eligible applicants. The State or local agency must require applicants determined to be adjunctively or automatically income eligible to document their eligibility for the program that makes them income eligible as set forth in paragraph (d)(2)(vi) of this section.

**Adjunct or automatic income eligibility criteria**

246.7(d)(2)(vi) Adjunct or automatic income eligibility. (A) The State agency shall accept as income-eligible for the Program any applicant who documents that he/she is:

(1) Certified as fully eligible to receive SNAP benefits under the Food and Nutrition Act of 2008, or certified as fully eligible, or presumptively eligible pending completion of the eligibility determination process, to receive Temporary Assistance for Needy Families (TANF) under Part A of Title IV of the Social Security Act or Medical Assistance (i.e., Medicaid) under Title XIX of the Social Security Act; or

(2) A member of a family that is certified eligible to receive assistance under TANF, or a member of a family in which a pregnant woman or an infant is certified eligible to receive assistance under Medicaid.

**Acceptable evidence from other state-administered programs**

246.7(d)(2)(vi) (B) The State agency may accept, as evidence of income within Program guidelines, documentation of the applicant's participation in State-administered programs not specified in this paragraph that routinely require documentation of income, provided that those programs have income eligibility guidelines at or below the State agency's Program income guidelines.

**Exemption from standard income limits for adjunctively eligible applicants**

246.7(d)(2)(vi)(C) Persons who are adjunctively income eligible, as set forth in paragraphs (d)(2)(vi)(A) of this section, shall not be subject to the income limits established under paragraph (d)(1) of this section.

**Policy Memo:**

**Assessing adjunct eligibility prior to traditional income screening**

WIC State and/or local agencies must assess automatic or adjunct eligibility before requiring additional documentation for an income eligibility determination. During the certification process, WIC State agencies must first attempt to determine if the applicant is adjunctively or automatically income-eligible before performing a traditional income screening.

In order to strengthen existing Program flexibilities and ease the burden on parents/caretakers with newborn infants, WIC State agencies are strongly encouraged to use applicable adjunctive

program participation by the mother or other household members, to enroll the infant on WIC as soon as possible after birth.
FNS recognizes the importance of certifying newborn infant(s) as soon as possible, without placing undue burden on parents or caretakers. An infant born to an individual who is enrolled in SNAP or Medicaid, or into a family that is receiving assistance under TANF may be considered adjunctively income-eligible without any additional income documentation being collected for the infant in order to support certification as soon as possible following birth.

## Authority

7 CFR Part 246.7(d)(2)(v)(A)
7 CFR Part 246.7(d)(2)(vi)(A-C)
WIC Policy Memo #2013-3
WIC Policy Memo #2023-6 Streamlining Certification Documentation Guidance

## Procedures

**Conditions that confer adjunctive income eligibility**
An applicant will be adjunctively income eligible for WIC if they are

- Certified as eligible to receive (with Notice of Award document or verifying in IMPA)
    - Food Assistance (SNAP)
    - Medicaid
    - FIP/TANF (FIP is Iowa's TANF program and is listed as TANF in the data system)
    - One of the following waiver programs (including applicants on a waiting list):
        - Medicaid Home and Community Based Ill and Handicapped Services (HCBS-IH)
        - Intellectual Disability (ID)
        - AIDS/HIV
        - Brain Injury (BI)
- Presumptively eligible (with Notice of Award document or verifying in IMPA) for
        - FIP/TANF
        - Medicaid
- Certified as income eligible with the Iowa Head Start or Early Head Start Programs (HS/EHS)
    - HS/EHS adjunctive eligibility is only valid if the participant was screened to qualify for HS/EHS based on income eligibility and meets the 100% or 130% income eligibility criteria. Requirements of the program.
        - Participants qualifying for HS/EHS based on other adjunctive programs accepted by WIC must provide proof of that program participation to WIC.
    - The Iowa WIC HS/EHS Adjunctive Eligibility form is valid for 1 year from the date signed by HS/EHS staff; a new signed form is needed annually to confirm continued enrollment.

An applicant will be adjunctively income eligible for WIC if they are a member of a household that:

- Receives SNAP
- Has a FIP/TANF recipient
- Has a pregnant woman currently on Medicaid
- Has an infant currently on Medicaid or
- A child certified as income eligible with the Iowa HS/EHS Programs

**Steps to follow for recording adjunctive eligibility**

1. Check for Adjunct or Automatic Eligibility first
   Before collecting income information, the local agency must determine whether the applicant qualifies through adjunct or automatic income eligibility.
2. Obtain Required Proof of Adjunct Eligibility
   If the applicant reports to be adjunctively income eligible, they must provide documentation showing current certification for the qualifying program (SNAP, Medicaid, FIP/TANF or HS/EHS)
   - For virtual certifications, applicants should be submitting acceptable documentation before the teleWIC appointment.
3. Verify That Documentation Meets Requirements
   Do not accept cards alone (e.g., Medicaid, SNAP, FIP/TANF cards) because they do not show eligibility dates. The list of acceptable documents is available in the WIC data system.
   - The HHS Medicaid or SNAP eligibility referral lists may only be used as proof of adjunctive eligibility if it was received within the last 28-31 days.
4. Record Documentation in the WIC Data System
   All proof provided must be recorded in the WIC data system as part of the certification record.
5. Ask for verbal declaration of income (sources, amount and time period) and select "Verbal report" for the proof provided for income. Explain that they automatically qualify for the WIC program because they participate in a program that provides adjunctive eligibility, but we are still required to collect their income information, and it won't affect their eligibility for WIC.

**Additional clarifying information about adjuntive eligibility proofs**

It's best to continue to remind participants to bring their Medicaid cards and/or letters of eligibility to their WIC appointment. However,

- Once a participant's Medicaid ID number has been documented in the WIC data system, that participant no longer needs to present their Medicaid card for eligibility purposes.
- WIC staff can verify current Medicaid eligibility in IMPA prior to or at the certification appointment using the number recorded in the participant record.

**Steps to follow when proof of adjunctive eligibility cannot be verified, no other proof of income is available and income declared is within the income guidelines**

If the applicant cannot provide proof of adjunctive eligibility (e.g. forgot it) OR their Medicaid eligibility cannot be verified before or during the appointment (e.g. system is down) AND the participant has no other proof of income (paystubs, etc.) but declares their income to be within the income guidelines for WIC then

1. Record the program(s) that would confer adjunctive eligibility and leave the "Proof" field blank within the Adjunct Eligibility link.
2. Ask for a verbal declaration of income (sources, amount and time period) and leave the income "Proof" blank.
3. Complete a "Signed Statement"
    - In-person: print and complete the form from the WIC data system.
    - teleWIC: send the form electronically or have the participant write the required information, sign it, and return it electronically.
4. Scan and save the completed "Signed Statement" in the participant's record in the WIC data system. Tell the participant they must submit proof (electronically or in person) within 30 days to continue program participation;
    - The missing proof of income and adjunct eligibility fields will trigger the option to provisionally certify the applicant when the CPA clicks on the Certify button. Provisional certification results in one month of benefits and an automatic system alert about the need to provide proof of income/adjunct eligibility within 30 days to continue receiving services.
5. If applicable, verify the participant's Medicaid status in IMPA when the system is available. If currently eligible, fulfill provisional eligibility in the WIC data system, issue their next two months of benefits and call the participant to reschedule their next appointment. If not eligible, call the participant to confirm their arrangements regarding what proof will be needed to fulfill their provisional eligibility.

**Steps to follow when proof of adjunctive eligibility and income cannot be reasonably provided**

If the participant cannot reasonably provide proof of adjunctive eligibility or income (e.g., theft, loss, or disaster) and there is no other way to verify their eligibility on your end then

1. Record the program(s) conferring adjunctive eligibility,
2. Select "Affidavit" as the proof provided. "Affidavit" is the formal name for the printout "Signed Statement" completed by an applicant,
3. Print and complete a "Signed Statement"
    - In-person: print and complete the form from the WIC data system
    - teleWIC: send the form electronically or have the participant write the required information, sign it, and return it electronically
4. Scan and save the completed "Signed Statement" in the participant's record in the WIC data system, and

5. Ask for a verbal declaration of income (sources, amount and time period), and select "Verbal report" for the proof provided.