

## Adjunctive Eligibility

### Policy

#### USDA Federal Regulations:

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.

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.

(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.

(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:

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

Local agencies must assess automatic or adjunct eligibility before requiring additional documentation for an income eligibility determination.

Adjunctively income eligible applicants must provide documentation that they are currently certified eligible to receive benefits from the specified programs. Proof of documentation provided must be recorded in the WIC data system. For teleWIC appointments, proof must be provided in advance of the appointment.

Medicaid, SNAP and FIP/TANF cards alone are not acceptable since they do not list the period of eligibility. Acceptable documentation is listed in the WIC data system.

An applicant will be adjunctively income eligible for WIC if the applicant is:

- Certified as eligible to receive benefits from Food Assistance (SNAP), Medicaid, or FIP/TANF
  - The Food Assistance Program identifies a head of household to receive benefits for all household members. Therefore, all individuals in that household are income eligible for WIC.
  - If the only household member currently on Medicaid is a child, only that child is adjunctively income eligible for WIC. This includes the HCBS-IH, ID, AIDS/HIV and BI waiver programs.
  - The Family Investment Program (FIP) is Iowa's Temporary Assistance to Needy Families (TANF) program. In the data system, FIP is listed as TANF.
- Certified as income eligible with the Iowa Head Start or Early Head Start Programs (HS/EHS)
  - The Iowa HS/EHS program adjunctive eligibility will only be valid if the participant was screened for income eligibility and meets the 100% and/or 130% income eligibility requirements of the program. If participants are adjunctive eligible for HS/EHS participation based on programs WIC also accepts, they will need to provide proof of that program participation to WIC. The Iowa WIC HS/EHS adjunctive eligibility form is only valid for 1 year after dated by HS/EHS staff. While HS/EHS screens income only once per enrollment cycle (which exceeds one year) their screen can be used the adjacent year without a new HS/EHS income screen, however we will need a new form signed and dated by HS/EHS staff to validate continued enrollment in the HS/EHS program.
- Presumptively eligible for either FIP/TANF or Medicaid (with Notice of Award)

document or verifying in IMPA).

- An applicant for the Medicaid Home and Community Based Ill and Handicapped Services (HCBS-IH), Intellectual Disability waiver (ID), AIDS/HIV, or Brain Injured (BI) waiver program (includes applicants on a waiting list), or
- A member of a household with:
  - A FIP/TANF recipient or
  - A pregnant woman or an infant currently on Medicaid or
  - A child certified as income eligible with the Iowa HS/EHS Programs.

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.

If the applicant provides proof of current program enrollment OR Medicaid eligibility has already been verified in IMPA OR is listed on a HHS SNAP referral list the agency received within the last 28-31 days, then

- record the program(s) conferring adjunctive eligibility,
- document the type of proof provided, and
- ask for a verbal declaration of income (sources, amount and period), and select “Verbal report” for the proof provided for income.

If the applicant fails to provide proof of adjunctive eligibility (forgot it) OR presents a Medicaid card AND their Medicaid eligibility cannot be verified before or during the appointment (e.g., Internet server is down) AND the participant has no other proof of income (pay stubs, etc.) then

- record the program(s) conferring adjunctive eligibility and leave the field, “Proof provided,” blank;
- ask for a verbal declaration of income (sources, amount and period);
- leave the field, “Proof”, blank;
- print and complete the “Signed Statement” from the WIC data system or in the case of a teleWIC appointment send the signed statement electronically or have the participant write the required information from the Signed Statement on a piece of paper, sign it and send it to you electronically;
- scan and save the completed “Signed Statement” in the participant record in the WIC data system.
- tell the participant to bring or provide proof via electronic means (e.g. text or email) within 30 days in order to continue program participation; and
- continue the assessment to determine nutrition risk.
- A participant must provide two out of three required documents; identity, income/adjunctive eligibility and residency. (If the participant is missing proof of adjunct eligibility/income and identity or residency, then the certification may not be completed.)
  - The missing proof of income field will trigger the option to provisionally certify an 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 within 30 days to continue receiving services. Make arrangements for the applicant to provide the missing proof within the next month. (Could be submitted via electronic means or in person.)

- If applicable, verify the participant's Medicaid status in IMPA when Internet access 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.

If the participant cannot reasonably provide proof of adjunctive eligibility or income (e.g., theft, loss, or disaster)

- record the program(s) conferring adjunctive eligibility,
- select "Affidavit" as the proof provided,
- print and complete the "Signed Statement" from the WIC data system or in the case of a teleWIC appointment **send the signed statement electronically or** have the participant write the required information from the Signed Statement on a piece of paper, sign it and send it to you electronically,
- scan and save the completed "Signed Statement" in the participant record in the WIC data system, and
- ask for a verbal declaration of income (sources, amount and period), and select "Verbal report" for the proof provided.

Note: "Affidavit" is the formal name for the print out "Signed Statement" completed by an applicant.

## Best Practices

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.

WIC defines a family (economic unit) as a group of related or unrelated persons sharing financial and other resources. Applicants declaring a zero income should be asked to describe their living circumstances and how they obtain basic living necessities such as food, shelter, medical care and clothing. Sources of income such as withdrawals from savings, child support, or assistance from sources not living in the economic unit, should be reviewed.