Identification Requirements

Policy

USDA Federal Regulations:
Verification requirements
246.7(c)(2)(i) At certification, the State or local agency must require each applicant to present proof of residency (i.e., location or address where the applicant routinely lives or spends the night) and proof of identity. The State or local agency must also check the identity of participants, or in the case of infants or children, the identity of the parent or guardian, or proxies when issuing food, cash-value vouchers or food instruments. The State agency may authorize the certification of applicants when no proof of residency or identity exists (such as when an applicant or an applicant's parent is a victim of theft, loss, or disaster; a homeless individual; or a migrant farmworker). In these cases, the State or local agency must require the applicant to confirm in writing his/her residency or identity.

Recording requirements
246.7(i)(4) All certification data for each person certified shall be recorded on a form (or forms) which are provided by the State agency. The information on the forms shall include:

> a description of the document(s) used to determine residency and identity or a copy of the document(s) used or the applicant's written statement when no documentation exists.

Authority

7 CFR Part 246.7 (c)(2)(i) *excerpt*
7 CFR Part 246.7 (i)(4)

Procedures

When is proof of identification required?
Reasonable proof and documentation of identity is required for

- Applicants at initial and subsequent certification appointments (in-person and teleWIC)
- Participants and proxies to receive WIC benefits on behalf of a participant(s) (in-person).
- If there is a name change (e.g. adoption, marriage or divorce)

What is acceptable proof?
Acceptable proofs of identification are listed in the WIC data system.

Proof of identity must be implemented in a manner that does not constitute a barrier to participation.

When no proof of identity exists (such as when an applicant or an applicant's parent is a victim of theft, loss, or disaster; an individual experiencing homelessness; or a migrant farmworker) applicants must sign a statement attesting to their identity.

An eWIC card as identification

When you issue an eWIC card, you are providing an applicant with an acceptable source of proof of identity for future WIC purposes. Therefore, you must see another acceptable proof of identity before issuing this card or using it as proof of identification for new and subsequent family members.

Issue an eWIC card to each economic unit. Follow these guidelines:

- Issue the card only after eligibility has been determined and the participant has been certified.
- Explain that the eWIC card is the only identification required when purchasing WIC benefits at the grocery store or a special purpose vendor.
- Explain that the eWIC card should be brought to every WIC appointment.
- Encourage each participant to treat the eWIC card like other forms of identification.

An eWIC card can be replaced if it becomes unusable, difficult to read, or if a participant reports it lost or stolen.

- The participant must provide proof of identity before a lost or stolen card is replaced.
- Tell the participant to destroy the old card if it is later found.

Proofs submitted via electronic means

- They must not be submitted more than 30 days prior to the appointment.
- Proofs submitted via electronic means must be deleted immediately upon review.
- For certifications and recertifications, proof of identity may be submitted ahead of time, but it should not be recorded in the identity panel until the day of the appointment because that is also where you must indicate if they are physically present at that appointment or not. Instead, a comment/alert should be entered in the record as to what was submitted and seen and then on the day of the appointment that proof can be used as the proof of identity and physical presence documented.
    - E.g. A birth certificate is submitted electronically for a new infant or child. The support staff reviews it, enters a comment/alert in the record that they saw the birth certificate on the date they saw it and then the person seeing the participant on the day of the appointment will create the new record on the Identity panel, record the proof that was seen as noted in the comment/alert and enter the physical presence status of the participant that day.

Steps for documenting proof of identity

Use the following steps to document proof of identity in the data system during a certification or recertification appointment. If the applicant:

- Has proof but did not bring it (forgot it)
    - Tell the applicant that proof of identity must be provided in order to receive services,
    - Provide a list of acceptable forms of identity,
    - Issue a Notice of Ineligibility for failure to bring proof of identification and
    - Reschedule their appointment
- Has no proof due to theft, loss, disaster, or a recent move to this country
    - Select "Affidavit" as the proof provided,
    - Print and complete the Signed Statement from the WIC data system,
    - Tell the applicant to bring proof of identity when proof is available, and
    - Continue the certification appointment.
    - Scan the affidavit into their record.

Best Practices

If identification is submitted electronically prior to the appointment, best practice would be to still ask for identification the day of the in-person appointment.