

SECTION: Certification**SUBJECT: Income Eligibility**

Federal Regulations: §246.7(d)(1); WIC Policy Memorandum 2010-02: Implementation of Public Law (P.L) 111-80- Exclusion of Combat Pay from WIC Income Eligibility Determination and related guidance documents; WIC Policy Memorandum 2011-07 Conversion factors for WIC Eligibility Guidelines

POLICY

An applicant's household unit income shall be at or below 185% of the Office of Management and Budget's poverty guidelines which are revised annually.

Recipients of the following programs are automatically income eligible for WIC benefits:

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Family Assistance Program (TFA)
- Medicaid Program: HUSKY A, C and D

HUSKY A provides Medicaid coverage for **adults** with incomes up to 138% of the Federal Poverty Level (FPL), **pregnant** women up to 263% of FPL and **children** up to 201% FPL.

HUSKY C provides health coverage for eligible adults 65 and older, and adults (18 – 65 years) with **disabilities**, whose income is up to 52% of the FPL.

HUSKY D provides coverage for **eligible adults** age 19-64 with income up 138% of FPL. An **eligible adult** is an adult without a dependent child. Example, first pregnancies, or a woman without custody of her children. Pregnant women applying for WIC with HUSKY D coverage should be encouraged to apply for HUSKY A.

Participation in TFA, Medicaid/HUSKY or SNAP benefits must be verified.

Verification of TFA and/or SNAP benefits

1. Ask the participant to bring their award letters. If the award letter is not available....
2. Ask the participant if they can access their SNAP/TFA benefit on www.connect.ct.gov . If the participant does not yet have access they can complete the access process while at the WIC office. It takes moments. If they cannot access their information via the website....
3. Call the customer service number on the back of their Connect Card. If the participant has a balance other than \$0 staff can document Adjunct eligibility for SNAP and select Phone Verification. Staff must ask the participant the total amount of their award and document that amount as Participant Reported in the Income Verification grid. For example you call and hear that the participant has \$49 of benefits remaining. The participant shares that her total award is \$350. After documenting adjunct eligibility staff should document \$350 as participant reported since you did not receive verification of the total award.

Verification of HUSKY Benefits

HUSKY participants should be asked to provide their HUSKY Health Member ID card indicating the type of HUSKY program they are on.



If the HUSKY Health Member ID card is not available, the Gray EBT Connect Card should be requested.



Verify eligibility of HUSKY A, C, or D in the DSS Eligibility Verification Response (EVR) portal. Ensure that you are checking the Service Information to determine which HUSKY program the participant is enrolled in. Remember HUSKY B does not confer eligibility to WIC.

Valid Search Combinations:

- Client ID + SSN
- Client ID + Birth Date
- Birth Date + SSN
- Full Name + SSN
- Full Name + Birth Date

Eligibility Response Quick Reference Guide

Eligibility Verification Request

Client ID last name From DOS* 10/01/2019
 SSN First Name, MI To DOS* 10/09/2019
 Birth Date
 Service Type Code 1 30 - Health Benefit Plan Coverage Service Type Code 2
 Service Type Code 3 Service Type Code 4
 Service Type Code 5

Eligibility Verification Response

Verification Number 1928204XGJ
 Response Text Client is eligible. Refer to Benefit Plan for specific program coverage.

Client Information

Client ID Last Name
 SSN First Name, MI
 Birth Date Street
 Gender City, State, Zip

Benefit Plan

Service Information	Benefit Month Effective Date	Effective Date	End Date	Message
Husky A. For Behavioral Health Services, call BHP at 877-552-8247.	10/01/2019	10/01/2019	10/09/2019	

Deductible Information

Service Information	Effective Date	End Date	Base Deductible Amount	Remaining Amount
Husky A			\$0.00	

Out of Pocket Information - Includes Deductible and Coinsurance

*** No rows found ***

Service Type Codes - Medicaid Services

Service Type Code /	Service Type Information	Copay	Coinsurance
1	Medical Care		
33	Chiropractic	\$0.00	0%
35	Dental Care		
4	Diagnostic X-Ray	\$0.00	0%
40	Oral Surgery	\$0.00	0%
42	Home Health Care	\$0.00	0%
45	Hospice	\$0.00	0%
47	Hospital	\$0.00	0%
48	Hospital - Inpatient	\$0.00	0%
5	Diagnostic Lab	\$0.00	0%

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A person who documents that he/she is a member of a household that contains a SNAP or TFA recipient or that contains a pregnant woman or an infant who receives HUSKY shall also be determined adjunctively income eligible for WIC.

CT-WIC manually calculates income from multiple sources at more than one frequency. If there is a problem with this feature in CT-WIC, local agency staff shall use the following conversion procedures to determine household income as outlined in USDA-FNS-WIC Policy Memorandum 2011-07.

In 2008, the Child Nutrition Program (CN) established new conversion factor procedures for the purpose of determining income eligibility for their applicants. In an effort to improve consistency between FNS Program areas, and to resolve the confusion associated with using conversion factors when determining income eligibility, WIC has decided to implement the procedures established by CN. These procedures are outlined as follows:

NEW CONVERSION FACTOR PROCEDURES

1. If a household has only one income source, or if all sources have the same frequency, do not use conversion factors. Compare the income, or the sum of the separate incomes, to the published IEGs for the appropriate frequency and household size to make the WIC income eligibility determination.
2. If a household reports income sources at more than one frequency, perform the following calculations:
 - Annualize all income by multiplying weekly income by 52, income received every two weeks by 26, income received twice a month by 24, and income received monthly by 12.
 - *Do not round the values resulting from each conversion.*
 - Add together all the unrounded, converted values.
 - Compare the total to the published IEGs (annual income for the appropriate household size) to make the final income eligibility determination. Do not recalculate the published IEGs, as they are already calculated and rounded up to the next whole dollar prior to being published in the Federal Register.

NOTE: For the migrant farm-worker, a letter from the current employer may be used to determine income.

Applicants from households with adult members who are unemployed shall be eligible based on income during the unemployment period or if the loss of income causes the current household income to meet the WIC income eligibility guidelines.

Income includes:

- Gross cash or monetary compensation for services including wages, salary, commissions, or fees
- Net income from farm and non-farm self-employment
- Social Security
- Dividends or interest on savings or bonds, income from estates or trusts, or net rental income
- Public assistance or welfare payment
- Unemployment compensation
- Government civilian employee or military retirement or pensions or veterans' payments
- Private pensions or annuities
- Alimony or child support payments
- Nutrition assistance document
- Regular contributions from persons not living in the household
- Net royalties
- Self employed applicants
- Other cash income, to include but not limited to cash amounts received or withdrawn from any source including savings, investment trust accounts and other resources, which are readily available to the family.

Income shall NOT include:

- Basic Allowance for Housing (BAH) received by military service personnel for on or off-base housing or Combat Pay during Deployment to a Designated Combat Zone. See below for more details.
- The value of in-kind housing and other in-kind benefits
- Income or benefits received under any Federal program or act which are excluded from consideration as income by an legislative prohibition, including: The value of assistance to children or their families under the National School Lunch Act, the Child Nutrition Act, and the Food Stamp Act
- Student financial assistance received from any program funded under Title IV of the Higher Education Act of 1965 (e.g., the Pell Grant, Supplemental Education Opportunity Grant, State Student Incentive Grants, National Direct Student Loan)
- Plus, College Work study and Byrd Honor Scholarship used for specified costs (i.e., books, materials, tuition, fees, supplies, transportation)
- Payments received under the Job Training Partnership Act
- Payments received under the Low-Income Home Energy Assistance Act
- Reimbursements from Uniform Relocation Assistance & Real Property Acquisition Policies Act
- Any payments to volunteers under Title I (VISTA and others), and Title II (RSVP, Foster Grandparents and others) of the Domestic Volunteer Service Act
- Benefits received through the Farmer's Market Nutrition Program
- The value of any childcare payments made under Section 402 (g)(1)(E) of the Social Security Act, as amended by the Family Support Act
- Child Care and Development Block Grant payment
- Short-term, non-secured loans
- Federal/State Income Tax Rebates

Explanation of Military Income

In determining income eligibility of any applicant whose family contains one or more military members, all gross income should be counted except the value of in-kind housing:

- Basic Allowance for Housing (BAH), Family Separation Housing (FSHJ) and Overseas Housing Allowance (OHA). Also excluded from determining income eligibility is the value of the Cost of Living Allowance (COLA), mandatory salary reductions for the GI Bill and other in-kind benefits. *Basic Allotment for Sustenance (BAS) is considered income.
- Military off-base housing is not considered income. Additional monetary allowances provided to military personnel stationed in areas with higher than average housing costs, such as Basic Allowance for Quarters (BAQ) OR Variable Housing Allowance (VHA), are not considered income.
- If a military family has one or more members stationed overseas or away from home who are receiving additional military compensation such as hazardous duty or combat pay, family separation allowance, and/or foreign duty pay, this is counted as family income. This additional income may only be provided on a temporary basis. If this is the case, the family's income should be averaged over the past 12 months. See below for exclusions.

Applicants from families in which one or more family member are military reservists who have been placed on active duty may experience dramatic changes in their income sources and total gross income such that they may become eligible for the WIC program. In this circumstance, the family's income eligibility is determined based on the family's current rate of income (while the reservist is on active duty), as opposed to income received over the past 12 months.

Included as Gross Income for Military Families:

Updated 10-2019

- Basic Pay
- Basic Allotment for Subsistence (BAS)
- Flight Pay
- Deployment pay*(Payments can be counted over a 12-month period)
- Family Separation Allowance
- Foreign Duty Pay
- Hazardous Duty Pay
- One year Extension Pay (Extension of Hazardous Duty Pay, this payment begins on the 13th month of deployment of combat; this payment cannot be prorated over a 12-month period.)

Military Combat Pay during Deployment to a Designated Combat Zone

Combat pay is defined as an additional payment made under Chapter 5 of Title 37 of the United States Code that is received by the household member who is deployed to a designated combat zone. See additional guidance documents for assistance interpreting the LES.

<http://frwebgate.access.gpo.gov/cgi-bin/usc.cgi?ACTION=BROWSE&TITLE=37USCC5&PDFS=YES>

Combat pay is excluded from income determination if it is:

- Received in addition to the service member's basic pay;
- Received as a result of the service member's deployment to or service in an area that has been designated as a combat zone; and
- Not received by the service member prior to his/her deployment to or service in the designated combat zone.

A combat zone is an area that the President of the United States designates by Executive Order as an area in which the U.S. Armed Forces are engaging or have engaged in combat. As with other types of income commonly received by military personnel, such as the Basic Allowance for Housing or Basic Allowance for Subsistence payments, combat pay received by service members is normally reflected in the entitlements column of the military Leave and Earning Statement (LES).

Excluded Income for Military Families:

- Basic Allowance for Housing (BAH)
- Basic Allowance for Quarters (BAQ)
- Variable Housing Allowance Housing (VHA)
- Family Separation Housing (FSH)
- Overseas Housing Allowance (OSA)
- Cost of Living Allowance (COLA)
- Mandatory salary reductions of the GI Bill
- Family Subsistence Supplemental Allowance (FSSA)
- Combat Pay if above 3 conditions are met

Combat Zone Areas:

Executive Order 12744 (effective 17 Jan 1991)

Arabian Sea Portion that lies North of 10 degrees North Latitude and West Of 68 degrees East Longitude

Updated 10-2019

- Bahrain
- Gulf of Aden
- Gulf of Oman
- Iraq
- Kuwait
- Persian Gulf
- Qatar
- Oman
- Red Sea
- Saudi Arabia
- United Arab Emirates

Direct Support of EO 12744

- Turkey effective 1 Jan 2003
- Israel effective 1 Jan – 31 July 2003
- Eastern Med effective 19 Mar – 31 July 2003
- Jordan effective 19 Mar 2003
- Egypt effective 19 Mar – 20 Apr 2003

Executive Order 13239 (effective 19 Sep 2001)

- Afghanistan

Direct Support of EO 13239

- Pakistan effective 19 Sep 2001
- Tajikistan effective 19 Sep 2001
- Jordan effective 19 Sep 2001
- Incirlik AFB Turkey effective 21 Sep 2001
- Kyrgyzstan effective 1 Oct 2001
- Uzbekistan effective 1 Oct 2001
- Phillipines (only troops w/orders that reference OEF) effective 9 Jan 2002
- Yemen effective 10 Apr 2002
- Djibouti effective 1 Jul 2002

Executive Order 13119 (effective 24 Mar 1999) Public Law 106-21 Establishing Kosovo as Qualified Hazardous Duty Area (24 Mar 1999)

- The Federal Republic of Yugoslavia (Serbia/Montenegro)
- Albania
- The Adriatic Sea
- The Ionian Sea north of the 39th parallel

Public Law 104-117 Establishing a Qualified Hazardous Duty Area (November 1995)

- Bosnia
- Herzegovina
- Croatia
- Macedonia

For other policies that impact income determination at certifications and during the certification period- see WIC 200-07 and WIC 200-21.