

**SECTION: Certification****SUBJECT: Income Eligibility Documentation**

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**Federal Regulations:** §246.7(d)(2)(v(A-D))-(vi)**POLICY**

Determine the applicant's income and complete the CT-WIC Income Information Screen as follows:

- Inquire about the applicant's household income.
- Document the number of people in the family (i.e., the "economic unit" or "household", composed of a person or group of persons that has its own source of income). If the applicant is a pregnant woman, increase her family size/household by one or by the number of expected multiple births, if this would qualify her under WIC program income eligibility standards.

**Note:** Local agencies are not required to implement this procedure if increasing the pregnant woman's family size conflicts with her cultural, personal or religious beliefs.

- Ask if the applicant is a recipient of Temporary Family Assistance (TFA), Medicaid/HUSKY A, C, or D and/or the Supplemental Nutrition Assistance Program (SNAP) or is a member of a family that contains a TFA or SNAP recipient or a pregnant woman or an infant who receives HUSKY A, C or D benefits. If the applicant states that he or she is on HUSKY A, C or D /Medicaid, obtain their HUSKY Health Member ID card or Connect Card if the Health Member ID card is not available, to verify their enrollment by using the Medicaid Automated Eligibility Verification System (AEVS).
- If verified, enter the client number on the HUSKY Health Member ID card or Connect Card into the CT-WIC Income Information screen. If applicable, document participation in TFA, SNAP and/or other public assistance programs in CT-WIC.

**Proof of Adjunctive Income Eligibility (Document must specify that individual is eligible through the WIC Certification date)**

- The Supplemental Nutrition Assistance Program (SNAP)
- Temporary Family Assistance Program (TFA)
- Medicaid: HUSKY A, C or D
- Notice of eligibility for any of the above programs

Refer to WIC Policy 200-06, Income Eligibility for instructions of Verification of TFA, SNAP and Medicaid/ HUSKY A, C or D.

**Proof of Non-Adjunctive Income Eligibility (Document cannot be more than 60 days old, unless using along with a current document to determine annual income)**

- Pay stubs, representing the recent pay periods for one month

- Current W-2 form
- Current year 1040 Tax Return Form (with Schedule C only for self or seasonally employed)
- Letter from employer on letterhead stating gross income and frequency
- Unemployment benefit notification letter
- Unemployment check(s) (from previous 30 days)
- Student financial assistance document
- Social Security retirement benefits letter
- Alimony payments-Court Decree or copies of check
- Child support payments-Court Decree or copies of check
- Verification of Certification card
- Short Term Disability

## **Guidance for Income Determination of Special Situations:**

### **Self Employed Applicants/Participants**

Gross income is problematic to determine for a family where one of the household members is self-employed because they cannot provide pay stubs based on a monthly salary or hourly wage. In such instances the best and most reasonable documentation is last year's Income Tax Return (Form 1040).

1. On the Form 1040, locate the line Business income or (loss). Schedule C or C-EZ should be attached to verify the business expenses. Use the line titled *Adjusted Net Income* as it accounts for the costs of doing business (business expenses) and the self-employed health insurance deduction.
2. Then compare that annual amount against the WIC guidelines for the number of persons in the Family Economic Unit.
3. If the local agency has further questions, e.g. one of the household members is no longer employed but has earnings on last years' tax return; call the State agency for clarification.

### **Migrant Farmworkers**

Income eligibility of migrant farmworkers shall be determined no more than once annually. Local agencies shall not require determination of income eligibility for any migrant farmworker (or their family member) that presents an expired Verification of Certification (VOC) card if income eligibility was determined less than 12 months prior. Income eligibility shall expire 12 months from the date of the last income determination.

An applicant with no proof of income, such as a victim of theft, loss, or disaster, a homeless individual, a migrant, a person who works for cash, or a pregnant teen in crisis may sign a statement attesting to her or his household income.

Migrant farmworkers and their family members are defined by federal regulation as individuals whose principal employment (over 50 percent) is in agriculture on a seasonal basis, who have been so employed within the last 24 months, and who establish a temporary residence for the purpose of such employment. This may include field worker, farm equipment operator, harvester, etc.

## **Participants Residing in Institutions/Homeless Facilities**

All persons in a residential institution/homeless facility may not be considered as members of one "family unit" for purposes of income eligibility determination. The family size of the institutionalized person or unit of related persons, e.g., a mother and her children in a temporary shelter for battered women, does not include other residents of the shelter. Income of the resident shall be considered separate from the income of the other residents and the revenues of the institution/facility. For additional information see 200-26 Homeless Individual WIC Participants.

## **Zero Income**

Applicants/Participants reporting zero income shall be prompted to describe in detail their living circumstances and how they obtain basic necessities such as food, shelter, medical care and clothing, in order to properly apply WIC rules pertaining to family size and income. Documentation of income could include bank statements, child support, etc. This income must represent the last 30 days.

If the applicant/participant claims zero income, complete a self-declaration form for a period up to 30 days. In cases where it is established that an applicant/participant is truly with minimal or no resources, local agencies can offer invaluable links to crucial resources and assistance. Follow up on any public assistance or income, 30 days after the initial (re)certification is required for continued participation in the WIC Program.

## **Foster Care**

Foster children must be considered as a family size of one. While foster children participate with Husky A/Medicaid it is important to capture income for completion of the certification process. A verbal declaration of the amount paid to the family for the care of the foster child shall be obtained if the amount is not indicated on the placement paper. No other income should be considered.

Income screening shall be done annually at every re-certification for foster children, even if they have not changed foster homes.

## **Emancipated Minors**

An emancipated minor is defined as a person who assumes most adult responsibilities before reaching the age of majority (usually 18). **Emancipated** minors are no longer considered to be under the care and control of parents -- instead, they take responsibility for their own care.

In most cases emancipated minors are HUSKY/Medicaid eligible. If the applicant/participant has Medicaid /HUSKY A, C or D, or other state assistance they are adjunctively income eligible. Document the applicant/participant's adjunctive eligibility in CT-WIC Income Information screen. If the applicant/participant is not adjunctively eligible, determine what income is supporting the economic unit. If the applicant/participant claims zero income, follow the procedure for Zero Income accordingly.

## **Students**

Student Financial Assistance in the form of grants and scholarships are included as income (with the exception of those grants and scholarships specifically excluded in §246.7(d)(2)(iv)(12)). Loans

(whether from student financial aid or private) that must be paid back, **should not** be counted as income.

Loans in which the participant has constant or unlimited access (i.e. a trust, savings, or monthly personal loan from a family member) are considered as income because they do not have to be paid back.

**Please note students should have their income determined in the same manner as other participants.**

### **Applicants for Family Members on Strike**

Consider a strike, lockout or furlough as a temporary decrease in income. Both annual and current income may be used to assess the income of applicants or family members on strike/furlough. Since annual income may exceed WIC income eligibility guidelines, current income may be assessed to determine eligibility.

Remind the applicant/participant to report any changes in income to the WIC office as they occur. The WIC office should also refer the applicant/participant to other sources of aid or assistance.

### **Multiple Economic Units at One Address**

For WIC purposes, "family" is defined by the Federal WIC regulations as a "group of related or nonrelated individuals who are living together as one economic unit (except residents in an institution or homeless facility). The definition of income for WIC purposes includes gross income earned by any and all members of a family. The terms "household", "family" and "economic unit" can be used interchangeably, however when determining WIC eligibility the latter is preferred. It is reasonable to assume that persons living in residences of others, whether related or not, are likely receiving support and sharing resources which renders them members of the economic unit with which they live. However, it is possible to establish that more than one economic unit lives under one roof through appropriate questioning. For example, a pregnant woman who is sharing an apartment with her sister may be determined to be a separate economic unit from her sister if the staff can reasonably establish that she has a separate source of income and is paying her proportionate share of household, living and personal expenses. For income determination, an economic unit must have its own source of income and adequacy of the income; whether the available income is adequate to sustain the economic unit, should be the determining factor, not whether the unit receives any in-kind benefits.

### **Documentation of Income Eligibility**

Indicate the type of proof shown for each applicant's income eligibility determination on CT-WIC Income Information screen. If the applicant is found to be adjunctively income eligible, ask the applicant (or parent of a guardian) to verbally state their household income. Enter the amount in CT-WIC.

If ineligible, complete and issue a Notice of Participant Action form. Give a copy to the applicant and scan a copy of the documentation into CT-WIC.

Retain a copy of the proof of income presented by the Applicant/Authorized Person in the CT-WIC file.

An applicant with no proof of income, such as a victim of theft, loss, or disaster, a homeless individual, a migrant, a person who works for cash, or a pregnant teen in crisis may sign a statement attesting to her or his household income.

If an applicant/participant meets all other eligibility criteria at certification but fails to bring acceptable documentation to the appointment a local agency shall permit an applicant/participant to self declare income for a maximum of 30 days. One month of benefits can be issued.

Inform the applicant/participant that if after 30 days, the necessary proof of income is not provided the applicant/participant will be ineligible for program benefits. Use the Self Declaration form to document the reason proof is not available. Instruct the applicant to fill in the income amount, and to sign and date the form. Give the form to the Program Coordinator or designee for review. Add an Alert in CT-WIC to ensure that additional benefits are not issued until the documentation is received.

For applicants/participants who meet all other eligibility criteria at certification but have one of the following reasons for lacking proof of income:

- Victim of theft, loss or disaster
- A homeless individual
- A migrant or a person who works for cash

Use the Self Declaration form to document the reason proof is not available and self declare their income. Instruct the applicant to fill in the income amount, and to sign and date the form. This form is valid for a maximum of 30 days. One month of benefits can be issued. Give the form to the Program Coordinator or designee for review. Provide the Verification form and review instructions for completion (request a reliable third party, such as a social service agency, church, legal aid society or an employer confirm the individual's income) and advise the applicant/participant the completed Verification form must be returned at next appointment to continue WIC benefits.

The **ONLY** exceptions in which self declaration of income is allowed for **MORE** than 30 days are:

- For pregnant teen in crisis for whom the necessary documentation is not available.
- For individuals for whom the Local Agency Program Coordinator determines the income documentation requirement would present an unreasonable barrier to participation.

Use the Self Declaration form to document the reason the proof is not available and instruct the applicant to fill in the income amount and sign and date the form. In these two instances, completion of the Verification Form by a third party is NOT required.