

**SECTION: Certification****SUBJECT: Transfer of Verification of Certification (VOC)**

---

**Federal Regulations:** §246.7(k), 246.26(d)

See also WIC Policy Memorandum #2016-4 Verification of Certification

**POLICY**

The WIC local agency shall issue a Verification of Certification (VOC) card or CT-WIC generated VOC form to all participants who plan to relocate outside of the state during the certification period. The individual's certification shall remain valid until the end of the certification period. The primary intent of the VOC requirements is to ensure seamless and continued participation of certified participants through the entirety of their certification period in the event of relocation by the participant.

**BACKGROUND**

Section 17(f)(9) of the Child Nutrition Act of 1966 (42 U.S.C.1786(f)(9)) requires that an eligibility certification remain valid for the period for which an individual was originally certified, specifically if that participant moves from one area of WIC operations to another. The WIC regulations at 7 CFR 246.7(k) set forth the general requirements for issuance, acceptance, and content of VOC.

The provisions also aim to ensure seamless and continued participation of certified participants and reduce the administrative burden on a certified participant, as well as local agencies. Protecting WIC program integrity is also an important consideration for the implementation of VOC policy.

Finally, the requirements of the Health Insurance Portability and Accountability Act of 1996 (HIPAA, P.L.104-191 ) do not apply to the information collected by the WIC Program for Program purposes (WIC Policy Memorandum 2002-2: Department of Health and Human Services' Regulations to Implement the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and Applicability to the WIC Program). In those instances where WIC services are provided by an entity that is otherwise subject to the HIPAA requirements, local agencies should avoid comingling WIC information and HIPAA protected information, such that HIPAA protected health information should not be included on the VOC.

**Relocating outside of State**

For participants relocating to another service area outside of the state:

- Issue a printout of the CT-WIC generated VOC, which includes the date of income determination, benefits start date, benefits value through date (BVT), priority, risk factors and certification dates.

**Verification of Certification**

Site: 060201 - East Hartford Health Department: Main Office

---

**Participant Name** Smith, Amyra  
**Participant ID** 200 836 145  
**Family ID** 700402124  
**Authorized Person Name** Lewis, Jessica

---

**Date of Birth** 01/16/2016  
**Category** IFF Infant Formula Fed  
**Priority** 2  
**Certification Dates** From 01/27/2016 to 01/15/2017  
**Income Determination** 03/24/2016  
**High Risk** No  
**Next Benefits Due** 01/23/2017

---

**Nutritional Risks**

701: Infant (0 - 6 months) of a WIC Mother or a Woman Eligible for WIC During Pregnancy

**Food Prescription**

24 OZ Infant Cereal - All Authorized  
32 JAR Infant Fruit & Vegetables - All Authorized  
7 CAN Similac Advance powder 20 cal 12.4 oz can

- Signature and printed/typed name of the local agency staff must be included on the VOC.

**Printed Name of Official:** \_\_\_\_\_

**Signature of Official:** \_\_\_\_\_

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA. Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.asc.usda.gov/complaint\\_filing\\_cust.html](http://www.asc.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442 or (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

- Explain to participant the use of VOC as proof of eligibility for continued program benefits
- Inquire when the participant will be moving. In the "Cert Action" screen in CT-WIC, terminate the participant after issuance of the VOC by selecting "Transferred Out-of-State" from the "Term Reason" drop down and select a "Term date" dependent on when the participant indicates that they will be moving if different than the day of issuing the VOC. This is to ensure that the participant is able to redeem their benefits until they move.

- If the participant receives WIC formula in Food Package III (infant formula, exempt infant formula, or WIC-eligible nutritionals), provide the participant with a copy of the completed Connecticut WIC Medical Documentation Form on file to streamline the transfer of benefits.
- Complete a Notice of Participant Action Form and check box, "Other", write in the space provided *Out of State Transfer* or "OST" and scan the copy into the participant's file in CT-WIC.

## Relocating into State

VOC cards shall be accepted from participants, including migrant farm workers, who have been participating in a WIC program outside Connecticut.

The WIC local agency shall accept all VOC cards which are recognized as State or National cards if such cards include at a minimum the participant's name and the certification date, including those cards which may have incorrect or outdated information.

## Guidance

Screen all VOC cards, as some may appear to be an identification card. The VOC card shall include the following items:

- Participant's Name
- Certification Date
- Date of Income Determination: This may be different than the certification date.
- Nutritional Risk Criteria
- Date Certification Expires
- Signature and printed/typed name of the local agency official in the originating jurisdiction
- Certifying local agency name, address and phone number
- An Identification number (which may be the WIC participant ID number) or other form of VOC accountability.

If the certification period is still valid and the VOC card is incomplete, obtain missing information from the participant if possible or previous WIC program and complete card. Certify the individual and issue benefits. If you are unable to reach the local agency WIC Program, contact the State Agency VOC point of contact at: <http://www.fns.usda.gov/wic/wic-contacts>

Occasionally, a transferring participant will present a VOC that is missing one or more of the required components. The participant must not be penalized for the omission of the required information. Therefore, a VOC must be considered valid if it contains the following three items: 1) the participant's name; 2) the date of certification, and 3) the date the certification period expires.

If a nutritional risk is not recorded on the VOC or if the participant was certified based on a nutritional risk condition not used by the Connecticut WIC Program, CT-WIC will generate risk 502 "Transfer" with a system generated priority (based on an entered or unknown priority) to establish nutritional risk for that participant.

### Proof of Residency and Identity:

While a VOC is considered sufficient proof of income and nutritional risk eligibility, transferring participants must provide proof of identity and current residency to the receiving agency. If proof of

identity or residency is not immediately available, the local agency may wait to process the transfer until the information is provided. In the case of participant who are unable to provide documentation, the local agency may accept a written statement from the participant as described in 7CFR 246.7©(2)(i).

If a VOC is presented to a receiving local agency and the certification will expire soon (within the next 30 days), the receiving local agency may conduct recertification for the convenience of the participant.

A 30 day extension may be granted to an Out of State (OST) participant when coordination of care with a provider and appointment scheduling poses a barrier

If the certification period is no longer valid, process the individual as a new applicant. However, migrant farm workers and their family members with expired VOC cards will be declared to satisfy the income eligibility guidelines if the income was determined during the previous 12 months.

If the WIC State agency determines WIC local agencies should institute waiting lists, the participant with a VOC card shall be placed first on the list ahead of all waiting potential participants, regardless of their priority group. See WIC Policy 200-30 Initiating Participant Waiting Lists

### **Reissuing Benefits**

- If the participant has checks, issue all benefits for which the participant is eligible.
- If the participant has their WIC EBT card, call to get a balance on their card and issue all benefits for which the participant is eligible.
- Collect and destroy the unused food instruments (checks) or WIC EBT card.
- If the participant does not have their WIC EBT card, contact the previous WIC program in an attempt to verify benefit issuance and redemption and issue all benefits for which the participant is eligible.
- If an attempt to access information on benefits redeemed information is unsuccessful, issue a prorated benefits package for the current month.

### **Providing Confidential Participant Information to other WIC State or local agencies**

Federal regulations at 246.26(d)(1)(ii) allow the sharing of confidential participant information to persons directly connected with the administration or enforcement of the WIC Program whom the State determines have a need to know for WIC Program purposes (such as reducing barriers to a WIC participant transferring out of State) without signed consent from the participant.

If a local agency staff person from another State or local WIC program calls and requests confidential participant information in order to process an out- of- State transfer, a signed **participant** release is **not** required to provide the information.