

Policy 510 WIC Cardholder Requirements January 8, 2021

POLICY

Local agency staff must identify a cardholder and issue at least one eWIC card in order to provide food benefits to WIC participants.

PURPOSE

To ensure local agency staff appropriately issue eWIC cards to WIC families.

RELEVANT REGULATIONS

§246.12 $\P(r)$ – Issuance of food instruments, cash value vouchers and authorized supplemental foods

§246.7 $\P(f)(2)(iv)$ – Processing Standards: Time frames for processing applicants Oregon Administrative Rules 333-053-0075 – eWIC Cards

OREGON WIC PPM REFERENCES

- ♦ 451—Change in Guardianship
- ◆ 501—Ordering and Securing eWIC Cards
- ♦ 511—Benefit Issuance
- ♦ 590—Participant Violations
- ♦ 595—Program Integrity: Separation of Duties
- ♦ 610—Required Proofs Identity, Residency, Income
- ♦ 620—Certification and Issuing Benefits or eWIC Cards to Co-Workers, Relatives, and Friends
- ♦ 621—Providing WIC Services During Home Visits
- ♦ 635—Participant Notification: Eligibility and Rights & Responsibilities
- ♦ 636—Participant Notification: Ineligibility and Termination from WIC

TWIST TRAINING MANUAL REFERENCES

Chapter 2, Lesson 100—Client Search and Demographics

Chapter 3, Lesson 1103—Family Cardholder Screen

DEFINITIONS

Caregiver: A person who has significant responsibility for providing food to the infant or child. The caregiver is usually part of the family unit, for example the parent or legal guardian of the infant or child.

Individual: An applicant or a participant.

Cardholder: A person authorized by WIC to use the eWIC card to shop for WIC food benefits at WIC-authorized vendors.

First Cardholder: The required cardholder for a WIC family Electronic Benefit Account (EBA). The first cardholder is either the adult participant or the parent or caregiver from the same household as the infant or child participant, therefore sharing the same address.

Second Cardholder: The optional second cardholder who has been issued their own eWIC card with the permission of the first cardholder.

eWIC Card: Magnetic stripe card used to purchase WIC authorized food from a WIC family's Electronic Benefit Account. Each card has a 16-digit Primary Account Number (PAN). Also referred to as a "food instrument."

Electronic Benefit Account (EBA): An account established for each WIC family administered by Oregon's banking contractor. Accounts are identified by the WIC family ID number assigned to that family. Food benefits for all participants in the family are aggregated into a single account.

Food Benefits: The foods a participant receives on WIC for a selected month. Depending on the participant category, food benefits provide specific amounts of WIC authorized foods, formulas, and/or a fixed-dollar amount for participants to obtain WIC authorized fruits and vegetables (referred to as a "Cash Value Benefit" or "CVB").

Personal Identification Number (PIN): A 4-digit number set by the cardholder via the banking contractor website or customer service phone number to keep access to their food benefits secure.

PROCEDURE

Assigning a cardholder

- 1.0 Every WIC family will be assigned an Electronic Benefit Account (EBA) with Oregon's banking contractor. The banking contractor will use the family's WIC ID number as the EBA number. In order to access food benefits issued to that EBA, each family must have at least one eWIC cardholder identified in the data system with a valid card issued.
 - 1.1. At least one eWIC card shall be issued at the time the first family member is found eligible for WIC.

Optional Cardholder

1.2. A second optional card may be issued for the convenience of the family.

Cardholder rights and responsibilities

2.0 The first cardholder is either the adult participant or the parent or caregiver from the same household as the infant or child participant.

First Cardholder rights and responsibilities

- 2.1. The first cardholder may bring an infant or child in for follow-up or certification appointments, attend nutrition education appointments, request transfers to another agency or state, choose or remove a second cardholder, and purchase WIC food benefits using the eWIC card.
 - 2.1.1. If the adult participant is unable to perform the duties of the first cardholder, they may select another household member to be the first cardholder.

2.1.2. If a different caregiver was the first cardholder for an infant or child participant when an eligible adult applies to be enrolled, the new applicant could be the second cardholder.

Second Cardholder rights and responsibilities

- 2.2. If considering a second cardholder, the first cardholder must be informed that the second cardholder has these same responsibilities and has access to the family's food benefits. The first cardholder should be encouraged to carefully consider the selection of any second cardholder.
- 2.3. The second cardholder may attend nutrition education appointments, bring in a child for follow-up or certification appointments and purchase WIC food benefits using the eWIC card.
- 2.4. The second cardholder does not have to be part of the same household as the first cardholder and participants. There is no age, relationship, or other criteria or restrictions as to whom the first cardholder may select as their second cardholder.
- 2.5. The second cardholder cannot change or remove the first cardholder, discontinue WIC services or transfer participants to another agency or state.
- 2.6. WIC staff or staff from the organization within which WIC is located (e.g. health department, tribal organization) cannot be assigned as a cardholder, unless it is for themselves or a family member. See ¶4.7 for information on issuing eWIC cards to family members.
- 2.7. If a family chooses to have two cardholders, they must identify two different people to be cardholders. One person cannot be both the first and the second cardholder.

No Proxies

- 2.8. Only cardholders are given these rights. Cardholders may not send anyone else (e.g. a Proxy) to the WIC clinic for services, even with a note. Most food package changes will not require office visits and can take place over the phone if the appropriate information can be provided. See ◆511—Benefit Issuance for more information.
 - 2.8.1. A non-cardholder may bring a child to the office to collect weights and heights with permission of a cardholder, if nutrition education, assessments, or certifications are done with a cardholder.

Required Cardholder Data

- 3.0 All cardholders must have an address and date of birth entered in the data system. This information is used for security purposes by both the WIC program and the eWIC banking contractor.
 - 3.1. The first cardholder address is the same as the participant address in the data system and must be kept updated.
 - 3.2. The first cardholder may provide required information on behalf of the second cardholder.
 - 3.3. The second cardholder's address does not have to match the first cardholder's but must be complete.

3.4. Individuals experiencing homelessness who do not have a home address can provide an address they can easily remember (e.g. childhood home, friend's address), the address of the homeless facility, or they can use the address of the local WIC program. See ◆ 655 Homeless for more info.

Card Issuance

- 4.0 The first cardholder must be identified in the data system and an eWIC card issued at the same appointment as WIC eligibility is determined.
 - 4.1. Cardholder assignment and eWIC card issuance may be entered by any WIC staff person at any time during the initial certification appointment, if card inventory policies are being met. See ◆501—Ordering and Securing eWIC Cards for more information.
 - 4.2. The first cardholder signs for the receipt of the eWIC cards when signing the Participant Signature form. See ♦635—Participant Notification: Eligibility and Rights & Responsibilities for more information.
 - 4.3. Required cardholder and eWIC card data must be entered in the data system before the eWIC card is given to the cardholder.
 - 4.3.1. First cardholders cannot be assigned to the family and initial cards cannot be issued over the phone.

Card issuance at home visits

- 4.3.2. When certifications are completed using a laptop at a home visit, cards may be delivered to new WIC participants at the time of the visit. If the certification information is gathered on paper during the home visit, the certifier can give an unissued card to the participant. The card information will be entered in the data system at the same time as the certification data, activating the card and issuing benefits. The participant will be notified when the eWIC card has been activated and benefits issued. See ◆621—Providing WIC Services During Home Visits for more information.
- 4.4. The first cardholder may provide the required information about their second cardholder and receive a second card at any time. When issuing the 2nd card to the 1st cardholder, the second cardholder does not need to be present or show ID in order to be issued an eWIC card. The first cardholder may take the second cardholder's eWIC card to them.

Cardholder Education

- 4.5. When issuing an eWIC card, WIC staff must provide the first cardholder with instruction on setting a PIN and the correct use of the eWIC card. If the second cardholder is not present, provide the first cardholder with any requested copies of materials and request that they instruct the second cardholder on setting a PIN, the correct use of the eWIC card and how to shop for WIC approved foods. See ◆635—Participant Notification: Eligibility and Rights & Responsibilities for more information on cardholder instructions.
- 4.6. eWIC cards do not have to be signed by the cardholder. It is recommended that the signature line on the back of the eWIC card be used to write the WIC ID number.

- 4.7. WIC staff must not issue eWIC cards to themselves, their relatives, friends, or co-workers. See ♦620—Certification and Issuing Benefits or eWIC Cards to Co-Workers, Relatives, and Friends for more information.
- 4.8. The first cardholder can remove the second cardholder at any time by informing the WIC clinic or contacting customer service. WIC staff must remove the second cardholder in the data system immediately to prevent the second cardholder from accessing any additional WIC food benefits or calling the eWIC banking contractor for an eWIC card replacement See ¶6.0.
- 4.9. When a first cardholder is removed, the eWIC card assigned to that cardholder becomes deactivated. Ensure that a new first cardholder is assigned and an active card is issued in order for benefits to be accessed.
 - 4.9.1. First cardholders that are removed due to death, incarceration or program disqualification must be replaced with another first cardholder.
- 5.0 Local agencies may issue an eWIC card to a new second cardholder at an appointment, without the first cardholder present if all of the following occurs:
 - 5.1. The potential second cardholder is in the clinic with a child/infant participant;
 - 5.2. The first cardholder can be reached by phone and verifies their own identity and consents to the 2nd card being issued;
 - 5.3. The first cardholder verifies the potential second cardholder's identity and address;
 - 5.4. The potential second cardholder shows proof of their identity which matches the information provided by the first cardholder.
- 6.0 A first cardholder may call to request a second cardholder be added and have the second cardholder's card mailed to them.
 - 6.1. The WIC staff person receiving the request must verify the first cardholder's identity and document the request in WIC notes.
 - 6.2. The second cardholder's card must be issued in the data system and mailed using the process listed in 8.2 for replacement cards.

Card security and PIN setting

- 7.0 If a cardholder does not have easy access to a phone or the internet, the WIC agency must provide them access to a PIN pad, a phone, or the internet in their clinic in order to set their PIN.
 - 7.1. Since access to the eWIC card and the PIN allows access to the food benefits, instruct cardholders on card and PIN security.
 - 7.2. Any address changes must be entered in the data system by WIC staff immediately to ensure the eWIC banking contractor has the most current information.
 - 7.3. For security purposes, WIC staff shall not ask for a cardholder's PIN or enter it into a PIN pad for them. Do not write the PIN on the eWIC card.

Replacing cards

- 8.0 If WIC staff receive any reports of lost, stolen, or damaged cards they must be deactivated in the data system immediately. The first cardholder may report either the first or second cardholder's card as lost, stolen, or damaged. The second cardholder may only report their card as lost, stolen or damaged.
 - 8.1. Cardholders may be issued replacement cards at the clinic or have replacement cards mailed to them. Replacement cards can be mailed by the agency or the participant can request a replacement from the eWIC banking contractor.
 - 8.1.1. Offer to mail the WIC Card or have the participant pick the card up at the clinic. Make sure the participant knows the card can take 5-7 days to arrive when mailed.
 - 8.2. If the participant chooses to have the agency mail the card, follow these steps:
 - 8.2.1. Confirm the address in the participant's file is correct.
 - 8.2.2. Make sure the cardholder understands how to PIN the card and shop if the card is a new card for a second cardholder.
 - 8.2.3. Make sure the cardholder understands that their PIN will remain the same if you are mailing a replacement card.
 - 8.2.4. Tape the eWIC card to a copy of the eWIC Card Mailing letter in English or Spanish.
 - 8.2.4.1. Agencies may modify this letter as needed for local needs as long as the identified elements are included.
 - 8.2.4.2. Fillable forms of the eWIC Card Mailing letter are available on the website
 - 8.2.4.2.1. English https://www.oregon.gov/oha/PH/HEALTHYPEOPLEFA MILIES/WIC/Documents/card-mailing-letter-eng.pdf
 - 8.2.4.2.2. Spanish https://www.oregon.gov/oha/PH/HEALTHYPEOPLEFA MILIES/WIC/Documents/card-mailing-letter-span.pdf
 - 8.2.5. Include a benefit list, a Food List, using your eWIC card brochure, a How to Shop brochure, with the card if it is for a new second cardholder.
 - 8.2.6. eWIC cards must be mailed in agency envelopes marked "Do Not Forward."
 - 8.2.7. Make sure the envelope is well sealed or taped shut and has adequate postage.
 - 8.2.8. Ask the participant to notify you if they have not received the card in 7 days.
 - 8.2.9. If the card is not received, deactivate that card and reissue a new card.

eWIC cards are not proof of identity

- 9.0 Cardholders must show Proof of Identity at certification and recertification appointments. Identity must be confirmed at appointments when benefits are issued. The eWIC card does not act as Proof of Identity for cardholders. See ♦610—

 Required Proofs Identity, Residency, Income for more information about acceptable forms of proof and situations where they are required.
 - 9.1. Cardholders are not required to bring the eWIC card to WIC appointments or to be issued WIC food benefits.
 - 9.2. Information on the Family Cardholder Screen should be used to confirm the identity of cardholders calling the clinic or at non-certification appointments when benefits are issued such as second nutrition education.

Changes in families, e.g. custody

10.0 While WIC food benefits are issued to individual participants, they are aggregated and accessed via the eWIC cards assigned to each WIC family account. When a family member changes family, benefits are de-aggregated back to individual participants and are reassigned to the participant's new EBA. Since cardholders are associated with an EBA, changes to the WIC family ID number require new cardholder assignment and eWIC card issuance. See examples below and ◆451—Change in Guardianship for more information.

Issue new card

Example: A child is removed from their household and put in foster care. If they are given a new WIC ID number, this generates a new EBA which requires an eWIC card to be issued to the foster parent with new cardholder information entered in the data system.

Multiple cards and EBAs

Example: A foster parent has multiple foster children, each with a different WIC ID number. The foster mom may have an eWIC card for each foster child and she will be identified as the first cardholder for each. She may set the same PIN for all the eWIC cards she is issued.

New card not needed

Example: The custody of a child is changed from the mother to the father. Both the mother and father have children on WIC in different WIC EBA's and have active eWIC cards. The WIC food benefits assigned to the child will be deducted from the mother's EBA and added to the father's EBA when the child's WIC ID number is changed from one to the other.

- 10.1. Termination of a participant will remove current or future benefits from the EBA depending on the termination reason but does not deactivate assigned cardholders or issued eWIC cards. See ◆636—Participant Notification:

 Ineligibility and Termination from WIC for more information on the appropriate notification needed for terminated participants.
 - 10.1.1. Cards do not need to be deactivated when participants are terminated or transferred.

Proxies for Disqualification

Disqualified cardholders may select a proxy cardholder in certain situations. See
 ◆590—Participant Violations for more information on this process.

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POLICY HISTORY

Date	* Major Revision, Minor revision
7/13/2018	Revision
11/25/2019	Minor Revision
1/8/2021	Minor revision

The date located at the top of the policy is the implementation date unless an "effective date" is noted on the policy. Policies will become compliance findings 6 months from the implementation date.

Release notes can be found in the corresponding document on the Policy and Procedure Manual page.

Major Revisions: Significant content changes made to policy.

Minor Revisions: Minor edits, grammatical updates, clarifications, and/or formatting changes have occurred.

Date of Origin: Date policy was initially released