



Policy 610

Required Proofs: Identity, Residency and Income

September 18, 2020

POLICY

All WIC applicants and participants (women, infants and children) shall provide the required proofs in order to receive WIC benefits. Proof of identity, residency, and income are required at every certification or re-certification. Proof of identity and residency is required when transferring from out of state. The WIC program also requires proof of identity for food benefit issuance.

PURPOSE

To assure proper verification of identity, residency, and income of WIC applicants or participants.

RELEVANT REGULATIONS

- ◆ 7 CFR §246.7 ¶(c)(2)(i)—Proof of Residency and Identity
- ◆ 7 CFR 246.7 (d)(2)(v)-Income Eligibility Documentation
- ◆ ASM 99-54—Strengthening integrity in the WIC certification process
- ◆ WPM 2013-3 – Income Eligibility Guidance

OREGON WIC PPM REFERENCES

- ◆ 510—[eWIC Cardholder Responsibilities](#)
- ◆ 590—[Program Integrity: Participant Violations](#)
- ◆ 612—[Income Eligibility: Adjunct or Automatic Income Eligibility](#)
- ◆ 613—[Income Eligibility: What Counts as Income?](#)
- ◆ 616—[Unavailable Proofs](#)
- ◆ 620—[Certification and Issuing Benefits or eWIC Cards to Themselves, Co-workers, Relatives or Friends](#)
- ◆ 621—[Providing WIC Services During Home Visits](#)

APPENDICES

Page 610.9 Appendix A Examples of Proof of Income for Types of Income

DEFINITIONS

Acceptable proof: Reasonable documentation of personal identity, income and current residency as approved by the state WIC program.

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.

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. 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 foods or formulas from a WIC family's Electronic Benefit Account (EBA). Each card has a 16-digit Primary Account Number (PAN). Also referred to as a food instrument.

PROCEDURE

Guidelines for obtaining proof of identity, residency, and income

- 1.0 Each local program must instruct incoming applicants, participants, parents, or caregivers to provide acceptable proof of identity, residency, and income when enrolling in the WIC program and at re-certification. The same proofs are required regardless of where the certification is conducted. See [◆621—Providing WIC Services During Home Visits](#). Proof of identity and residency are required when transferring into the WIC program from out of state. Refer to ¶5.0 for a listing of acceptable proofs for identity and ¶12.0 for a listing of acceptable proofs for residency.
 - 1.1. Local programs should establish practices that minimize the occurrence of applicants or participants arriving at the clinic without the necessary proofs.
 - Routinely and clearly communicate the kinds of information participants need to provide at their certification appointments for initial and continued service.
 - Consider handing out reminders regarding required proof documents and include proof information with appointment reminders.

Documentation Requirements

- 2.0 Document proofs of residence, identity and income in the data system. Identity is only documented for applicants or participants. Income and residence is documented for the household.
 - 2.1. If “Other” is selected as the type of proof, document the specific type of proof seen in the Enrollment Notes in TWIST.
 - 2.2. For more information on documenting proofs in TWIST, refer to [TWIST Training Manual, Chapter 3, Lesson 102—Enrollment](#).

Proof of Identity

- 3.0 Proof of identity must be provided for all participants, including infants and children.

Benefit Issuance

- 4.0 Cardholders being issued food benefits when in the WIC office must show proof of their identity before issuance at the time of enrollment or re-certification. **Example:** A non-participating adult who is a cardholder bringing a child in to be re-certified must show proof of their own identity in order to have benefits issued. See ¶5.0 for more information.

- 4.1. Local program staff must check the identity of a non-participating adult who accompanies an infant or child for enrollment or re-certification but are not required to document that verification.
- 4.2. If a non-participating adult accompanying an infant or child does not have their own proof of identity, issue one month of food benefits and an eWIC card. Schedule the participant for an appointment the following month to bring in the necessary proof of identity at that time. Normal issuance of food benefits may begin after the adult has shown proof. The 30 day termination process outlined in [◆616—Unavailable Proofs](#) does not apply in this circumstance.
 - 4.2.1. In special circumstances, the WIC Coordinator may choose to document the non-participating adult's lack of proof in the data system and treat it as no proof due to special situations, as described in [◆616—Unavailable Proofs](#).
- 4.3. Information in the data system that is unique to the family such as cardholder name and date of birth, child name and date of birth 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.

Types of acceptable proof of identity

- 5.0 When proof of identity is required, applicants, participants, cardholders, or proxies in lieu of disqualification will need to show acceptable proof of identity. A parent or caregiver must provide an infant or child's acceptable proof of identity at enrollment or re-certification (refer to [◆510—eWIC Cardholder Responsibilities](#) for information on who may bring in an infant or child for enrollment or re-certification). The proof of identity may be any of the following forms of identification that includes the individual's name:

Adults

- 5.1. Acceptable proof of identity for adults:
 - Social Security Card
 - Employee ID card
 - Pay stub
 - DHS Medical Care ID Card or Oregon Health ID Card or OHP Coverage Insert listing names and date of birth of family members covered by OHP (The OHP web portal cannot be used as proof of identity)
 - Driver's license, state-issued ID card, or tribal ID card
 - Passport
 - Birth certificate
 - INS documents
 - Precinct Memorandum Card (Voter Registration Card)
 - School ID card

Infants and Children

- 5.2. Acceptable proof of identity for infants and children:
 - Social Security Card
 - Home birth record

- Note from doctor or midwife on letterhead or prescription pad, documenting infant's birth
- DHS Medical Care ID Card or Oregon Health ID Card (The OHP web portal cannot be used as proof of identity)
- Hospital birth record, crib card or ankle bracelet
- Birth certificate
- Immunization record
- Tribal ID card

Health record

- 5.3. The individual's hard copy health record is acceptable proof of identification for:
- Applicants for whom the health department has a birth certificate or birth abstract; or
 - Applicants who are already receiving health department or program services (e.g., immunizations, family planning, well-child clinic, etc.) where proof of identity was already required.

Other types of acceptable proof of identity

- 5.4. This list is not exhaustive. If questions about other forms of proof arise, please contact your state nutrition consultant. To be approved the document must have initially required proof of identity to be issued. Proof of ID does not have to be current in order to be acceptable. In some cases, the approved form of proof may be in an on-line format.

Example: A letter addressed to the participant may show proof of residency but does not prove identity. An infant's name on a prescription alone does not indicate the doctor has determined identity by requiring proof of identity or by presence at the infant's birth.

Example: Government issued ID from other states or countries may be acceptable proof of ID. A Mexican driver's license or an Idaho Medicaid card would be acceptable proof of ID, even if it is expired because it required proof of identity to be issued originally.

Example: An on-line pay stub or an on-line immunization record may be acceptable as they have already been identified as approved forms of proof. WIC staff should not request passwords or other confidential information to access on-line forms of proof.

Transfer (VOC) card

- 6.0 A valid WIC transfer card or Verification of Certification (VOC) card is not an acceptable proof of identity. It represents proof of nutritional risk and current income eligibility for a participant moving into Oregon only for the current certification period.

WIC Issued ID Cards

- 7.0 For convenience to adult participants, parents or caregivers, once proof of identity is provided for a participant, local agency staff may issue a WIC ID card. The WIC ID card is acceptable proof of identity for all infants, children or adult participants listed

on the WIC ID card at subsequent appointments, even if there have been gaps in receipt of WIC service.

- 7.1. WIC issued ID cards are for the convenience of the WIC family and are not required at appointments. They serve as an additional Proof of Identity option.
- 7.2. Print or type the participant's name and ID number on the WIC issued ID card (Form 57-620) after proof of identity for that participant has been reviewed.
- 7.3. If in special circumstances, the participant, parent or caregiver is unable to provide proof of identify for a participant, staff may follow the process described in [◆616—Unavailable Proofs](#), and issue a WIC ID card for the duration of the certification period. In that case, an expiration date of the end of the certification period should be added after the participant name on the WIC ID card, ensuring that another form of proof of identity is requested at the next certification appointment.
- 7.4. A WIC ID card cannot be issued for non-participant adults or eWIC cardholders.
- 7.5. Cardholders must show proof of identity at certification and re-certification and at appointments when benefits are issued.
 - 7.5.1. The eWIC card does not act as proof of identity for eWIC cardholders because we do not see proof of identity for both cardholders at issuance, the name of the cardholder is not printed on the card, and there is no way to verify the PIN in the clinic. See [◆510—eWIC Cardholder Responsibilities](#) for more information.

Personally known participants

- 8.0 Once acceptable identification has been provided and established at the initial WIC appointment, and if the applicant or participant is personally known to local program staff, this can constitute proof of identity at subsequent appointments and for benefit issuance. Please refer to [◆620—Certification and Issuing Benefits or eWIC Cards to Themselves, Co-Workers, Relatives and Friends](#) for guidelines on determining eligibility or issuing benefits to relatives and friends.

Proof of Residency

- 9.0 Applicants or participants must reside within the jurisdiction of the State. Applicants and participants do not have to be U.S. citizens or permanent residents. All applicants and participants must show acceptable proof of residency at initial certification, re-certification, and when transferring in from another state.

Definition of residency

- 9.1. Residency means the location or address where an applicant or participant routinely lives or spends the night. The length of residency does not impact WIC eligibility and is not a prerequisite to receiving WIC benefits.
- 9.2. An adult member of a household who is not a WIC applicant or participant may show acceptable proof of residency for other member(s) of that household who are applying or participating in WIC, e.g., infants, children, teen moms or domestic partners.

Citizenship or alien status

- 9.3. Inform individuals that WIC does not require proof of citizenship or legal alien status, only proof of residency. Proof of residency is not proof of citizenship.
- 9.4. Local programs should implement proof of residency requirements in a way that does not constitute a barrier to any individual, especially to an individual who does not have a fixed address (e.g. homeless individual, military personnel or migrant).
- 10.0 Proof of residency is not required for benefit issuance after proof of residency has been established at eligibility screening.

Types of acceptable proof of residency

11.0 Listed below are types of acceptable proof of residency:

- Oregon ID card, driver's license, or tribal ID
- Current utility bills
- Current rent or mortgage receipts
- Bank statements or bank checks with current address
- Letters/notifications addressed to the participant with current address
- Precinct Memorandum Card (Voter Registration Card)

Note: If the individual's card shows the precinct is in your geographic service area, this counts as proof of residency.

- 11.1. In some cases, the approved form of proof may be in an on-line format if it shows the address, e.g. on-line utility bill or bank statement.

Not acceptable for proof of residency

- 12.0 The following are not acceptable for proof of residency.
 - 12.1. The WIC ID card or eWIC card is not an acceptable proof of residency.
 - 12.2. A P.O. Box number is not an acceptable proof of residency. The proof document must show the actual street address.
 - 12.3. The OHP ID card is not proof of residency.

Proof of Income

- 13.0 Applicants and participants must show proof of income for all household members at the time of enrollment and recertification.

Adjunctively income eligible for WIC

- 14.0 Applicants or participants are adjunctively income eligible for WIC if they can show proof that they currently participate in Medicaid/OHP, TANF, SNAP, or Food Distribution Program on Indian Reservations (FDPIR).
 - 14.1. Refer to [◆612—Income Eligibility: Adjunct or Automatic Income Eligibility](#), for procedures on certifying adjunctively income eligible individuals who can show proof that another member of their household currently participates in TANF or Medicaid/OHP.

Automatically eligible for WIC

- 15.0 Migrant farm-workers with WIC transfer (VOC) cards showing income determination was within the last twelve months are automatically income eligible for WIC. Refer to [◆612—Income Eligibility: Adjunct or Automatic Income Eligibility](#), for procedures on certifying automatically income eligible individuals.
- 16.0 If individuals are not adjunctively or automatically income eligible, proof of income from traditional sources is required.

Types of acceptable proof of income

- 17.0 Listed below are types of acceptable proof of income:
 - Proof of current eligibility for Medicaid or Oregon Health Plan (OHP), Temporary Assistance to Needy Families (TANF), Supplemental Nutrition Assistance Program (SNAP) or the Food Distribution Program on Indian Reservations (FDPIR), constitutes documentation of adjunctive WIC income eligibility.
 - Current pay stubs or letter from employer documenting income
 - Unemployment benefit stubs
 - Benefits or earning statements
 - W-2 Forms
 - Income tax return
 - Other appropriate documents sufficient for establishing income
 - WIC transfer card (VOC) for a current certification period
 - Migrant applicant with a WIC transfer card showing income determination within the last 12 months.
- 17.1. See Appendix A for Examples of Proof of Income for Types of Income.
- 17.2. In some cases, the approved form of proof may be in an on-line format, e.g. OHP website or pay stub.
- 17.3. Local programs may choose to request a written statement from a reliable third party that has knowledge of the individual's income to use as proof of income for individuals who do not have access to more traditional income documentation. This might include migrants, refugees, or individuals working for cash. Reliable third parties might include staff of a social service agency, sponsoring organization, legal aid society or employers. This is not, however, required and local programs may also use the "No Proof for Special Situations" form.
- 18.0 See [◆613—Income Eligibility: What Counts as Income?](#) for a complete listing of what is included as income or excluded from household income.

If you need this in large print or an alternate format, please call 971-673-0040.

This institution is an equal opportunity provider.

POLICY HISTORY

Date	* Major Revision, Minor revision
6/1/2016	Revision
9/9/2017	Revision
6/28/2019	Minor Revision
9/18/2020	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

APPENDIX A

Examples of Proof of Income for Types of Income

(Refer to [◆613—Income Eligibility: What Counts as Income?](#) for a complete listing).

For this type of Income:	Use this type of Proof of Income:
Monetary compensation for services, including wages, salary, commissions, or fees (including overtime payments with wages and salary)	<ul style="list-style-type: none"> • Current pay stub(s) noting the pay time frame (weekly, biweekly, monthly, etc.) • Signed statement from employer indicating gross cash earnings for a specified period
Net income from farm and non-farm self-employment	<ul style="list-style-type: none"> • W-2 forms or income tax return for the most recent calendar year • Accounting records for the self-employed
Social Security benefits	<ul style="list-style-type: none"> • Check stub/award letter from Social Security stating current amount
Dividends or interest on savings or bonds, income from estates, trusts, or investments	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year • Bank or account statements
Net rental income	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year
Foster care	<ul style="list-style-type: none"> • Foster child placement letter/foster parent award letter
Unemployment compensation	<ul style="list-style-type: none"> • Unemployment letter/notice
Government civilian employee, military personnel, or military retirement or pensions, veterans' payments	<ul style="list-style-type: none"> • Recent Leave and Earnings Statement (LES) for military personnel
Private pensions or annuities	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year
Alimony or child support payments	<ul style="list-style-type: none"> • Divorce decree • Statement from Child Support Division issued VISA (Reliacard) • Copy of check received
Regular contributions from persons not living in the household	<ul style="list-style-type: none"> • Letter from person contributing resources to the household
Withdrawals from any source, including savings, investments, trust accounts and other resources are readily available to the family.	<ul style="list-style-type: none"> • Bank or account statements indicating regular draws on the account(s)
Student financial assistance, such as grants and scholarships. This does not include loans.	<ul style="list-style-type: none"> • Award letter • Scholarship letter
Adjunctive Eligibility	<ul style="list-style-type: none"> • Notice of Award or Approval letter for SNAP or TANF, or Medicaid/OHP web portal showing current eligibility dates