



Policy 616

Unavailable Proofs

September 18, 2020

POLICY

WIC applicants and participants (women, infants and children) who are unable to provide the required proofs at enrollment or recertification appointments must be given a 30-day grace period in which to provide the proofs needed to participate in WIC. If providing proofs presents an unreasonable barrier, WIC applicants may document the reason on the [“No Proof Form”](#).

PURPOSE

To avoid barriers to service, WIC applicants and participants may receive one month of benefits and have 30 days to bring in required proofs or document the barrier which prevents them from providing proof. In either situation, staff must complete a [“No Proof Form”](#) in order to receive WIC benefits.

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 2011-7 – Conversion Factors for WIC Income Eligibility Guidelines (IEGs)

WPM 2013-3 – Income Eligibility Guidance

OREGON WIC PPM REFERENCES

- ◆ [426—Record Retention Period](#)
- ◆ [450—Confidentiality](#)
- ◆ [610—Required Proofs: Identity, Residency, Income](#)
- ◆ [611—Income Eligibility: Determining Income Eligibility](#)
- ◆ [612—Income Eligibility: Adjunctive or Automatic Eligibility](#)
- ◆ [655—Homeless Applicants](#)

TWIST TRAINING MANUAL REFERENCE

[Chapter 3, Lesson 102, Enrollment](#)

[Chapter 3, Lesson 801, Reactivate and Reinstate](#)

DEFINITIONS

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

Individual: An applicant or a participant.

Special situation: When a participant is unable to provide one of the required proofs because something in their life makes it unlikely that they will be able to obtain proof without it causing a barrier to receiving WIC services. Examples of special situations include being a disaster victim, being homeless, working for cash, having no source of income, or being a migrant.

PROCEDURE

Unavailable proofs

- 1.0 If an applicant or participant does not have one of the required proofs at the time of the enrollment appointment, staff must assess for eligibility, and then do one of the following:
 - 1.1. Mark “Eligibility Pending” in the data system, complete the eligibility pending section of a [“No Proof Form” \(57-633\)](#), and let the participant know they have 30 days to bring in proof; OR,
 - 1.2. Complete the section of a [“No Proof Form” \(57-633\)](#) which identifies the barrier to bringing in proof. No further follow-up is required.

Eligibility Pending

- 2.0 If the individual has acceptable proof available but did not bring one of the three required proofs to their appointment, document their self-reported income, current residence, or potential proof of identity on the eligibility pending section of a “No Proof Form”

30-day grace period/Eligibility Pending

- 2.1. Both the applicant/participant and a WIC staff person must date and sign the form declaring that the information given is accurate and will be presented at the WIC office within 30 days.
- 2.2. Mark “Eligibility Pending” in the data system. (See TWIST Training Manual [Chapter 3, Lesson 102, Enrollment](#))
- 2.3. Make sure the individual understands that they have 30 days to bring in the missing proof and that the participant will be removed from the program if they fail to bring in the acceptable proof needed by the given date or if the information provided shows them to be over the WIC income standards. Local agencies are not required to provide any further written communication about missing proofs.
 - 2.3.1. Verbally inform the applicant or provide written instructions on the 30-day grace period at the initial meeting. Include the income guideline, the date by which the individual must return the acceptable proof to the clinic, and an explanation that program eligibility cannot be finalized until the individual brings in the required proof.
- 2.4. If eligibility is pending, issue one month of benefits and an eWIC card. Continue to provide WIC services during the 30-day grace period. If necessary, schedule the participant for a time to bring in their proofs before they are terminated so you may issue additional benefits.

- 2.5. When the missing proof is brought in and documented in the data system, remove “Eligibility Pending.” The individual will continue to receive benefits for the remainder of their certification period, which started the month benefits were initially provided.
 - 2.5.1. Terminate services if the information provided by the applicant shows they are over the WIC income limit.

Failure to bring in acceptable proof

- 2.6. If an individual fails to submit the required proof(s) within the 30-day grace period, they will be terminated automatically from the program and will not receive any more benefits. No written notification will be provided. The individual is not required to pay back the benefits received for the initial month.

Reactivation

- 2.7. If an individual was terminated from the program for failure to bring in acceptable proof within the grace period but later returns with all acceptable proofs, rescreen and use the “Reactivate” transaction type in TWIST. (See TWIST Training Manual [Chapter 3, Lesson 801, Reactivate and Reinstate](#)) Benefits will be issued from the current month forward. Benefits will not be issued for previous months when eligibility was pending. See [Policy 610 Required Proofs – Identity, Residency, Income](#) for details of what is acceptable proof.
- 2.8. If an individual who has been removed later returns stating they cannot provide the acceptable proofs because of a special situation, reassess eligibility and have the individual fill out and sign the “No Proof Form” and document the reason. If eligible, use Reactivate and issue the appropriate benefits.

30-day grace period not allowed

- 2.9. Proof of adjunct or automatic income eligibility must be determined at the time of enrollment. If an individual states they participate in an adjunctively or automatic eligible program but cannot provide proof of adjunct or automatic eligibility at the time of certification or re-certification, staff must proceed with a standard income screening. If no proof of income is available and a 30-day grace period is provided, proof of adjunctive or automatic eligibility or any other proof of income can be provided within that 30-day period. Refer to [◆611—Income Eligibility: Determining Income Eligibility](#), for guidelines on how to proceed if the individual is not adjunctively or automatically eligible. See [◆612-Income Eligibility: Adjunctive and Automatic Eligibility](#) for information on those programs.

Proof not available

- 3.0 If an individual indicates that they cannot provide an acceptable form of the required proofs due to a special situation, complete the [“No Proof Form” \(form 57-633\)](#).
 - 3.1. Carefully assess why the individual is unable to provide proof. If staff determines the individual presents a special situation (as described in ¶3.5) and that requiring the individual to provide proof would present an unreasonable barrier to participation, allow the individual to self-declare and

complete the section of the “No Proof Form” which describes the special situation the participant is experiencing.

- 3.2. Refer to [◆655—Homeless Applicants](#) for details on that special situation.
- 3.3. A participant with zero income will not have proof available. Refer to [◆611—Income Eligibility: Determining Income](#) 8.0 for details on that special situation.

Ask questions

- 3.4. Ask questions to determine if the participant can provide the requested proof within 30 days, or if a special situation exists.

Examples of questions to ask

- 3.4.1. Questions to ask the individual may include but are not limited to the following:
 - Do you have documents showing acceptable proof?
 - Do you know what kind of documents you need to show us?
 - Are you able to return to the clinic with the required proof of income within 30 days?
 - Are there any barriers that would prevent you from bringing in the proof within the next 30-days?

Examples of special situations

- 3.5. Special situations may include but are not limited to:
 - theft
 - disaster
 - homelessness
 - migrant status
 - domestic violence
 - zero income reported
 - family members work for cash

Documentation

- 3.6. Local program staff must document on the form the reason(s) why proof is not available. Both the applicant/participant and a WIC staff person must date and sign the form declaring that the information given is accurate.
 - 3.6.1. A new form must be completed for each certification period, even if the reason proof is unavailable has not changed.
- 3.7. Document in the data system that no proof is available and that a “No Proof Form” has been completed. Then issue benefits as usual. No further follow up is necessary.

Record retention

- 4.0 Local programs may keep aggregate files for the “No Proof Form” and must retain these forms according to [◆426—Record Retention Period](#).

Submitting proofs

- 5.0 Proofs may be submitted to the clinic within the 30-day grace period via fax, mail, email, or text if the applicant cannot bring them in. Local programs may accept documents for one of the proofs from an individual, an employer or other health and social services agencies.

Overcoming barriers

- 5.1. The methods listed in 5.0 are helpful when overcoming barriers such as a disabled individual who is physically unable to return to the clinic, an individual who has an infectious disease, or an individual with no mode of transportation and living in an area with no access to mass transit.

Confidentiality

- 5.2. If agencies choose to accept proofs via fax, mail, email or text, they must take steps to ensure that information submitted via these methods is kept confidential. Agencies should work within their organization to determine how best to limit the risk of identity theft or breach of confidentiality.
- 5.2.1. Agencies should consider setting up a secure email, document submission site, or text system.
- 5.2.2. All proofs submitted with information about an applicant or participant must be treated with the same rules of confidentiality as the original documents. Please refer to [◆450—Confidentiality](#), for more information.
- 5.2.3. Any proofs submitted via fax or mail should be documented in the data system and then shredded.
- 5.2.4. Any proofs submitted via email or text should be documented in the data system and then the email or text deleted.

Reviewing proofs

- 5.3. Proofs received via fax, mail, email or text must meet the same criteria and include the same information as proofs reviewed in person.

Inform the individual

- 5.4. At the time of initial contact, inform the applicant or participant of potential problems with submitting proofs if the individual decides to mail, fax, email, or text any information to the clinic.

Potential problems

- 5.5. Potential problems include:
- lack of confidentiality
 - Potential for identity theft if email or text is insecure
 - Problems matching proofs submitted this way with a specific individual
 - Potential for miscommunication (mail or faxes may not get to the right staff member)
 - Lack of communication between the individual and the WIC program
 - Proofs may not be legible or are missing key information
 - Lost in the mail, shuttles or office routing process

EXAMPLE: An employer faxed the monthly income information of the boyfriend of the mother of a child who is applying for WIC. When the fax arrives at the clinic, clinic staff may find it impossible to match the name of the employee (boyfriend) to the appropriate applicant (child) because the name on the fax document is different from the child.

The mother of the child assumes that since proof has been faxed to the WIC clinic, no further action is needed, and her child will continue to be on WIC. However, since clinic staff is not able to match the proof to that child, the data system automatically terminates the child from WIC.

Informing the applicant

- 5.6. Provide the individual with the clinic’s address and the name of the staff person to whom it should be addressed, fax number, email address, phone number that will accept text messages, or website address for document submission.
 - 5.6.1. Advise the individual to mail copies, not original documents, to the clinic.
 - 5.6.2. Make sure the individual understands the 30-day grace period still applies.
 - 5.6.3. If local program staff do not receive any fax transmittals, mailed documents, emails, or texts verifying the missing proofs within 30 days, the person will be terminated from the program.

Local Agency Internal policy

- 5.7. The state WIC program recommends local programs that allow proofs submitted via fax, mail, email, or text have an internal policy and procedure for receiving and processing proof documents received with guidance to manage or reduce potential problems and issues.

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
11/2/2016	Revision
11/25/2019	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