Chapter 6E
Certification/Participation - Certification in Special Situations

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This chapter describes policies and procedures related to the certification of individuals in situations that are out of the daily routine.

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Attachments:

Attachment 1. Institutions and Homeless Facilities Letter of Compliance for the WIC Program *(Sample letter)*

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Transfer of Certification

The primary intent of the transfer or Verification of Certification (VOC) provision is to ensure seamless and continued participation of certified participants through the entirety of their certification period.

It is important to take steps throughout the certification period to ensure that the participant/parent/guardian/caretaker know the availability, process and purpose of the VOC. This includes VOC availability, the process for requesting a VOC as in the Rights and Responsibilities statement, and local agency staff routinely asking participants if they plan to move during the certification period. Populations that tend to move frequently include migrant farm workers, homeless participants, persons who live in institutions or homeless facilities, and military participants. Staff must print from the Crossroads system the Out of State Transfer Information sheet for a family in which there is a migrant farm worker and to any other family that is likely to be relocating during the certification period. Staff should also provide the NC WIC Program Notice and tailor the notice according to the participant's situation. Refer to Chapter 6D for information on providing notifications.

Participants and families moving within NC will not need the Out of State Transfer Information sheet from the local agency they are leaving. The receiving local agency (agency to which the family is transferring into) will simply transfer the family record to their agency using the Crossroads system.

- **Verification of Certification (VOC)**
  The Out of State Transfer Information sheet serves as verification of certification and is provided to participants who are planning to move out of state. It is addressed to the participant (if an adult) and the parent/guardian/caretaker of an infant or child participant. VOC documents, though unique for each state and the WIC Overseas Program, are recognized nationally. North Carolina VOC is valid to the end of the participant's certification period and is designed to serve more than one participant in a family. All information for the family is compiled automatically from the Crossroads system.

  - VOC documents may be unique from state to state. In order to provide key information for the seamless provision of WIC services and to prevent duplicate benefit issuance (dual participation), WIC regulations include eight items that must be present on the VOC documents as described below:
    - Name of participant,
    - Date the certification was performed,
    - Date income eligibility was determined,
    - The nutritional risk of the participant,
    - Date the certification expires,
    - The signature and printed name of the certifying local agency official,
    - The name address and phone number of the certifying agency, and

- An identification number or other form of VOC accountability.

Additional information provided but **not** required:

- Food Benefit Data: first date to spend, last date to spend, name of exempt formula or medical food, medical reason for prescription, and prescription expiration date (if applicable) or food prescribed.

- Food Prescription: participant name, (name of exempt formula, medical food, or food prescribed, medical reason and prescription expiration date if applicable) or food prescribed.

■ **State VOC Point of Contact Personnel**

If clients present with questionable or missing information or without the Verification of Certification the receiving agency is encouraged to contact the sending agency to verify any questionable information contained on the VOC. If the local agency cannot successfully obtain VOC information from the sending agency, they should connect with the designated VOC contact for that state. Listings of state VOC point of contact personnel may be accessed at the following website: https://www.fna.usda.gov/contacts.

State VOC personnel have one business day from the contact request to retrieve necessary information. If a local agency cannot verify the certification status within this time frame, local agency staff must treat the family as new applicants and determine program eligibility within appropriate processing standards. Handwritten information is permitted/acceptable if the current management information system or form does not currently include certain information.

A signed client release is not required to provide certification information to another WIC Program or WIC Overseas agency. Local agencies must not routinely require participants to sign a release of information with other WIC State or local agencies. Regulations allow a sending WIC agency to share information about a transferring participant with a receiving agency, without prior consent or written release by the participant.

■ **Assisting Transferring Families**

Staff must assist families who are moving within NC by identifying a WIC Program in their new residence location. Staff should inform families that the receiving WIC Program will electronically transfer the family records into their agency using the Crossroads system.

- **Assist "overseas" transfers.** In addition to a VOC, a WIC participant who is a member of the Armed Forces, a civilian employee of a military department, or a Department of Defense (DOD) contractor, including his/her family members, who indicates intent to relocate overseas during a certification period, should be given the following information about the DOD WIC Overseas Program**.**

- There is no guarantee that the Department of Defense (DOD) WIC Overseas Program will be operational at the overseas site where they will be transferred. Locations of the WIC Overseas Program can be found at: http://tricare.mil//Wic/.
- By law, only certain individuals are eligible for the WIC Overseas Program. Issuance of the VOC (Out of State Transfer Information sheet) does not guarantee continued eligibility and participation in the WIC Overseas Program.

Information about the WIC Overseas Program may be accessed on the TRICARE website http://tricare.mil//Wic/.

- **Terminate the participant.** Once it is known that a family has transferred out of state, local agency staff should terminate the family from their program and deactivate the family's eWIC card on the Issue EBT Card screen or void any current and future benefits on the Food Instrument List screen. Refer to Chapter 6D for information on providing notifications.

Accepting Transferring Families

- **In State Transfer**: When a transferring family contacts the WIC office in their new location, WIC staff should transfer the family without delay to ensure that the family receives program benefits to which they are entitled. WIC staff must complete the transfer using the Crossroads system which moves the electronic record into the receiving agency. Refer to Section 3 for information on enrolling transferring families if the local agency has a waiting list.

- **Display: "Are you Moving" Poster.** The "Are You Moving" poster must be displayed where it may be read by those who receive WIC services. It may also be displayed in group or individual nutrition education areas. Posters may be ordered from the Community Nutrition Services Section (CNSS) using the CNSS requisition form.

- **Transfers from Out of State**:
  VOC documentation from a WIC Program in another state or WIC Overseas Program must contain at minimum these elements to be valid:
  - participant name
  - most recent certification date
  - date the current certification period expires

  NOTE: Transferring participants who present a VOC with a minimum of these items must be treated as if the VOC contains all the required information. If a nutritional risk code is not documented on the VOC or if the participant was certified based on a nutrition risk condition that is no longer in use by the receiving agency, the receiving agency must use the equivalent risk code" Transfer of Certification" to establish nutritional risk for that participant. Refer to Chapter 6C for information on nutrition risk code. All VOC

documents must be scanned into the Crossroads System upon receipt.
Some states limit the certification of infants, children, and postpartum breastfeeding women to a six-month period. If an infant, child or postpartum breastfeeding woman transfers from one of these states, their certification period will be changed to reflect the North Carolina certification period.

Staff must use professional judgment around issuance of food benefits to a transferred family from another state. Out-of-state electronic benefits card (EBT) cannot be used in NC. The into-state transferring family must surrender to the local agency any unused food instruments (FIs) and cash-value vouchers (CVVs) or Electronic Benefit Transfer (EBT) card in their possession. The local agency must destroy any FIs, CVVs or EBT card(s) from the transferring family. Do not return the FIs, CVVs or EBT cards to the sending agency or to CNSS.

When the transferring family claims unused FIs/CVVs or EBT card are misplaced or lost during moving, staff must verify which months of food benefits have been issued by contacting the transferring agency. Staff are not allowed to reissue food benefits if the transferring agency issued food benefits and they are still in date. Refer to Chapter 8 on food benefits misplaced by the recipient.

When the transferring family provides the receiving local agency with FIs or CVVs or EBT card, staff should do the following:

- For the current month, if the family has already redeemed part of their FIs/CVVs, issue a prorated food package by adjusting the first month's food prescription based on the amount of benefits already redeemed. If the FIs and CVVs have not been redeemed and all are in hand, then establish a family issuance day and issue a full food package.
- For future months, issue a food package to the extent practicable that ensures the participant receives the maximum monthly allowance.

Residents of Institutions and Homeless Facilities

Residents of institutions and homeless facilities who are eligible for WIC may participate in the program. Refer to Chapter 6A, Section 5 on documentation of residency for residents of institutions and homeless facilities.

Definition of Institutions and Homeless Facilities

Institutions and homeless facilities are two different types of places.

- **Institution.** An institution is any residential accommodation, other than a private residence or homeless facility, which provides meal service. Examples include women's shelters, maternity homes, institutions where pregnant women are incarcerated, and colleges.

- **Homeless Facility.** A homeless facility is any facility that fits the following definitions and also provides meal service.
  - a supervised public or privately operated shelter designated to provide temporary living accommodations (*such as a rescue mission, congregate shelter, or shelter for victims of domestic violence*); or
  - a facility that provides a temporary residence for individuals intended to be institutionalized; or
  - a public or private place not designed for, or normally used as, a regular sleeping accommodation for human beings.

Compliant Institutions and Homeless Facilities

If a participant resides in an institution or homeless facility, the institution or homeless facility must comply with the following three conditions for the participant to receive WIC Program food benefits.

- The institution or homeless facility does not accrue financial or in-kind benefits from a resident's participation in WIC (i.e., reducing its expenditures for food service because its residents are receiving WIC foods).

- Foods provided by the WIC Program are available exclusively to the WIC participant to whom they were issued and are not used in a communal food service.

- The institution or homeless facility supports the resident's participation in the WIC Program, including use of supplemental foods, participation in nutrition education, and breastfeeding promotion and support.

Verifying Compliance of Institutions and Homeless Facilities

Once a participant reports their residency as being an institution or homeless facility, staff must assure that the institution or homeless facility is compliant with program policy. To verify compliance, staff should take the following steps.

- **Contact the institution or homeless facility.** Contact must be made with the institution or homeless facility by phone or in person to determine compliance with the required three conditions.
  Note: The local agency must follow-up with the institution or homeless facility to assure compliance with the conditions.

- **Obtain a signed letter from the institution or homeless facility.** The local agency must obtain a signed letter from the institution or homeless facility verifying their compliance with the required conditions. This letter must be scanned into the participant's record in the Crossroad system. (Refer to Attachment 1 for an example of a letter).
  - The institution or homeless facility must notify the Community Nutrition Services Section or local agency if the required conditions are unable to be met.

■ **Non-Compliant Institutions and Homeless Facilities**
When the local agency becomes aware that a WIC participant is living in an institution or homeless facility that does not meet the three required conditions or will not provide a signed letter verifying that they do, staff must:

- Refer the participant/parent/guardian/caretaker to a compliant institution or homeless facility if available;

- Continue providing nutrition education, breastfeeding promotion and support, food benefits, and referral services during the certification period; and

- Inform the participant/parent/guardian/caretaker that the local agency will discontinue food benefits (with the exception of infant formula) at the end of the certification period, if the participant still resides in a non-compliant institution or homeless facility.
  - If the participant continues to live in a non-compliant institution or homeless facility at the end of the certification period, the local agency staff must discontinue the participant's food benefits (with the exception of infant formula). Staff should print the NC WIC Program Notice and check the appropriate reason for the discontinuation of food benefits. The participant shall continue to be eligible to receive nutrition education, breastfeeding promotion and support, and referral services.

Waiting Lists

If the State WIC Program is spending its maximum allotment of food dollars, there may be insufficient funds to continue serving all eligible participants or to serve new applicants. When North Carolina WIC applicant/participant/guardian/caretaker cannot be served due to inadequate food dollars, the State WIC Program may require local agencies to implement a waiting list.

- **Implementation of a Waiting List**
  If waiting lists are to be implemented, Community Nutrition Services Section (CNSS) will notify local agencies and establish the Wait List Criteria in the Crossroads system. The notification will include the following information.

  - The effective date of the waiting list. Once the need for a waiting list is determined by CNSS, individuals meeting the defined criteria will be identified by the Crossroads system at initial certification and subsequent certification. Staff should complete the screens listed in the certification process. At the point where the user can certify, Crossroads will offer the option to place the applicant/participant on the waiting list rather than having the option of clicking the Certify button.

  - An applicant/participant/parent/guardian/caretaker must be notified in writing when being placed on a waiting list. The notification is printed from the Crossroads system.

  When funds become available to serve additional applicants/participants, CNSS will instruct local agencies on how to proceed with modifying or discontinuing their waiting list.

- **Participant Reinstatements**
  During the time that a waiting list is in effect, local agencies may reinstate a terminated participant only if his/her certification period is still current, his/her participant category and age are being served, and his/her priority level and risk score are being served.

  Otherwise, Crossroads applies the identified wait list criteria and places the participant on the waiting list

- **Waiting List Referrals**
  When an applicant is placed on a waiting list, the applicant/participant/parent/guardian/caretaker must be referred to other available food assistance programs such as: Food and Nutrition Services, food banks, food pantries, soup kitchens, and any other local agency emergency resource providers.

- **Transfer Participants**
  If a transferring participant from out-of-state with current verification of certification (VOC) documentation applies for services when the local agency is maintaining a waiting list, the transferring participant shall be placed on the waiting list and enrolled ahead of all other persons on the waiting list, regardless of their priority.

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-- Sample Letter --

Institutions and Homeless Facilities
Letter of Compliance for the WIC Program
(Official institution or homeless facility letterhead)

Date

To: *Name*, Local Agency WIC Director
Name, Local Agency WIC Program
Local Agency Mailing Address

We understand that the following three conditions must be met for a resident of our facility to participate in the WIC Program. We agree that we are in compliance with these conditions.

- Our facility does not accrue financial or in-kind benefits from a resident's participation in WIC (i.e., by reducing food service expenditures because residents are receiving WIC foods).

- The foods provided by the WIC Program are available exclusively to the WIC participant to whom they were issued and are not used in a communal food service.

- Our facility supports the resident's participation and services received from the WIC Program, including use of supplemental foods, participation in nutrition education, and breastfeeding promotion and support.

We agree to inform the local WIC agency if we cease to meet any of the conditions outlined above.

We agree to allow informal on-site visits by the local WIC agency to ensure compliance with the specified conditions.

_____
Name of Institution/Facility

_____
Name of Director/Administrator (print)

_____
Signature of Director/Administrator Date

_____ _____ _____
Phone Number Fax Number Email Address

_____
Institution/Facility Address

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