

## Section 3.3: Transferring Participants

2/2020

**References:** 7 CFR 246.7(k), 7 CFR 247.26(d)(l)(ii), Policy Memorandum 2016-4

**Policy:** Certified participants who are transferring from another state or local agency are eligible to continue receiving WIC services through their current certification period.

**Purpose:** All transferring participants will continue to receive WIC benefits for the duration of their original certification period without being re-screened and without regard to their risk status or assigned priority.

### Data Privacy

- Participant information collected by WIC is confidential and may only be used for WIC program purposes (except as otherwise permitted by regulation).
- WIC agencies should share information about transferring participants with other state or local WIC agencies without prior consent or a written release from the participant. Participants should not be asked to sign a release for transfer information.
- The Health Insurance Portability and Accountability Act of 1996 (HIPAA) does not apply to WIC information.

### Processing Standards

- Normal processing standards apply for all participants transferring into a local agency. See [Section 3.2: Processing Standards-Timeframes for Scheduling Certification Appointments](#).

### In-State Transfers

- An adult participant or the parent/guardian must show proof of identity and residency when transferring into a new agency.
  - If proof of identity or current residency is not yet available, issue only 1 month of benefits and place an Alert in the participant record to ensure those documents are provided at the next visit before additional benefits can be issued.
  - See [Section 5.2: Certification Procedures](#) for acceptable forms of identity and residency.
- Local agency staff will:
  - Initiate the transfer in the WIC Information System.

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- Review the participant record.
- Document the new address and the proofs of identity and residency. Update proxies if needed.
- Offer nutrition education, breastfeeding support and referrals if needed. Determine when the next visit should take place.
- Issue food benefits if not yet issued. Do not remove valid benefits issued by the previous agency unless the participant needs a food package change.
- Provide a list of local vendors, as appropriate.

### Out-of-State Transfers → coming from another state to Minnesota

**Verification of Certification (VOC)** forms are used for out-of-state transfers to provide documentation of eligibility to the new agency.

#### 1. Verify out-of-state transfer eligibility:

- If the participant has a valid Verification of Certification (VOC) or other document from the original state, enroll him/her if, at a minimum, there is adequate information documenting:
  - the participant's name
  - the certification start and end dates

The local agency may need to obtain additional certification information from the previous state in order to ensure continuity of care or to clarify any questionable information listed on the VOC.

- If the participant does not have adequate certification information from the previous state, verify current eligibility, including certification start and end dates, nutritional risk factors, and any unredeemed benefits by contacting the local agency in the previous state.
  - If contact information for the previous agency is not available, refer to the [FNS WIC Contacts](#) listing for that state's contact who can provide transfer information.
- If acceptable documentation of current eligibility cannot be determined, the participant must be offered a certification appointment within a timeframe that meets the appropriate processing standard. See [Section 3.2: Processing Standards-Timeframes for Scheduling Certification Appointments](#).
- If the certification will expire soon, a recertification may be done instead for the participant's convenience.

#### 2. Initiate a VOC transfer in the WIC Information System.

- Determine whether the participant/household has an existing record in the Minnesota WIC Information system or whether to create a new record.

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- An adult participant or the parent/guardian must show proof of identity and residency when requesting a transfer, even if s/he has a valid VOC from another state. Document these in the WIC Information System. See [Section 5.2: Certification Procedures](#) for acceptable forms of identity and residency.
  - The VOC document may be used as proof of identity for the child only.
  - If VOC documentation can be verified, but proof of identity and/or current residency is not yet available, issue only 1 month of benefits and place an Alert in the participant record to ensure those documents are provided at the next visit. Additional benefits cannot be issued until those are provided or a waiver signed.
- Record the certification end date. This is the last date of the month in which the certification ends. (e.g., certification end date from the previous state is 9/7/20; the date to record in the system is 9/30/20)
- Transferring participants in a current certification do not need an Initial Contact.
  - However for participants new to Minnesota, the WIC Information System will require the user to open and close the Initial Contact field.
  - For these situations, it is not necessary to document any dates in the Initial Contacts fields.

#### 3. Provide WIC Services

- Review certification risk codes as possible to determine nutrition education and follow up needs. Provide nutrition services or determine when the nutrition education visit is needed. See [Chapter 6: Nutrition Education](#).
- Make referrals, as appropriate.
- Review the [Rights and Responsibilities](#) (signature not needed).
- Assign and explain the Minnesota WIC food package.
  - Review the WIC Shopping Guide and how to identify the foods provided at the store.
  - Explain how to use benefits at the store.
  - Provide a list of local WIC vendors or explain how to find on the WIC App.
- Issue food benefits for which the participant is eligible.
  - Collect any food benefits or eWIC card that the participant has brought. Once reviewed, destroy these via confidential disposal.
  - Determine if there are unused benefits for the current month, including partially used benefits. It may be necessary to contact the previous state to verify. Provide those foods so that the participant does not miss out on foods he/she was not able to use before moving.
  - If available, review the Medical Documentation form for participants receiving Food Package 3.

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- If the form is not available, contact the previous state to verbally confirm that information and document in a Note.
- Participants do not need to provide new documentation from a Minnesota provider if the Medical Documentation from the previous state is still valid.
- Follow MOM guidelines to determine when a new [Minnesota WIC Program Request for Medical Formula](#) form will be needed in the future. See [Section 7.6: Medical Documentation](#) Medical Documentation.
- Provide information about Medical Assistance, health care providers, and other resources as needed to help the participant establish a new health care home and ensure follow up of the high risk condition requiring Food Package 3.

#### 4. Document the VOC transfer in the WIC Information System.

- Scan the VOC form (and Medical Documentation form if any) into the WIC Information System. Do not scan non-essential WIC materials from the other state such as the eWIC card.

**OR**

- Write a Note, documenting the source of the transfer information and any information that would facilitate continuity of care.

## Out-of-State Transfer → moving from Minnesota to another state

### Participants who will be moving out of state: WIC staff will

- Print and sign a VOC from the WIC Information System for migrants and for any participant that may be planning to move out of state. Participants can take the VOC to the new state as documentation of current eligibility if they move.
- Provide a copy of the Medical Documentation form for any participant receiving Food Package 3.
- Explain to participants how to transfer WIC services to another state:
  - Their WIC services will continue in the new state until the end of their certification period.
  - Take the VOC form, and Medical Documentation form if there is one, to the new WIC agency.
    - Or if they don't have the VOC form when they arrive, take their WIC Card to the new agency.
    - Or have the new agency call the MN local agency or state office.

### Request for transfer information from another state for participants who have already moved:

- WIC transfer information requested by other states must be provided no later than the next business day.
- Phone requests from other state WIC programs for transfer information are acceptable. If WIC staff are uncertain if the caller is legitimate, they may call that agency back at the official phone number or have that agency fax them the request on official letterhead to authenticate the source. (Reminder: WIC staff **cannot** request a release of information be signed by the participant to share this information)
- Terminate the WIC certification in the WIC Information System.

### Guidance

It is important to maintain continuity of care and appropriate follow up for all transfers.

As appropriate, Local Agencies should assure that participants know about and understand the VOC process, including that:

- WIC services will continue if they move to another state.
- The local agency can provide a VOC form for them to take to facilitate the transfer.

There are various ways to do this, such as:

- Point out and explain the VOC availability information on the [WIC Rights and Responsibilities](#) (Exhibit 1-K) or through the WIC App.
- Ask participants if they plan to move before their next appointment.

### Participants leaving Minnesota:

- When printing a VOC from the WIC Information System, it is not necessary to terminate the record if the move is not certain or there are other reasons for keeping the record active.

### Participants arriving in Minnesota:

- If documenting a VOC transfer into the agency with a Note, staff may choose to use the General Note heading titled “VOC” to more easily track those situations.
- If a participant arrives with complete VOC information, local agencies are encouraged to contact the previous state to notify them of the transfer so that the participant’s record and/or eWIC card in that state may be inactivated to ensure program integrity.

**Resources:** [HuBERT Training Modules / Transfers](#)

## Reference – Complete Listing of Hyperlinks

Section 3.2: Processing Standards-Timeframes for Scheduling Certification Appointments

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch3/sctn3\\_2.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch3/sctn3_2.pdf))

Section 5.2: Certification Procedures

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5\\_2all.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_2all.pdf))

FNS WIC Contacts (<http://www.fns.usda.gov/wic/wic-contacts>)

Chapter 6: Nutrition Education

(<https://www.health.state.mn.us/people/wic/localagency/mom.html#education>)

Rights and Responsibilities (<https://www.health.state.mn.us/people/wic/rights.html>)

Minnesota WIC Program Request for Medical Formula

(<https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/exhbts/ex7/7d.pdf>)

Section 7.6: Medical Documentation

([https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7\\_6.pdf](https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch7/sctn7_6.pdf))

WIC Rights and Responsibilities (<https://www.health.state.mn.us/people/wic/rights.html>)

HuBERT Training Modules / Transfers

(<https://www.health.state.mn.us/people/wic/localagency/infosystem/hubert/training/2019/transfers.html>)

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