

Section 5.2: Certification Procedures

8/2020

5.2.3 Identity

References: 7CFR 246.7 (e)

Policy: Each applicant must provide proof of identity at each certification. If the applicant is an infant or child, proof of identity for the parent, foster parent, or guardian is also required.

Purpose: To establish the identity of the applicant.

Procedures

If documentation is available:

1. At the certification, review proof of documentation of identity. Paper or electronic documentation, such as a proof viewed on the participant's phone, is acceptable. Some examples of acceptable forms of proof of identity include:
 - Baptismal certificate
 - Birth certificate
 - Crib card
 - Driver's license
 - Health benefits (insurance) card
 - Immunization record/registry
 - Passport
 - Pay stub
 - Phone/Online system such as MA
 - Photo ID: Acceptable forms include, but are not limited to, photo ID issued by governments (including tribal governments and governments of other countries), by employers and by schools
 - School ID
 - Social Security card
 - Social services benefit card

- Voter Registration card
- WIC Card (recertifications only)

Visual personal recognition by WIC staff at issuance of food benefits or subsequent certifications may be allowed once initial proof of identity has been documented.

2. If information is adequate, document sources in the participant record.
3. Proceed with the certification.

Temporary Eligibility – if documentation is not available

If required documentation for identity is not available at the certification appointment, the CPA should complete the certification process and notify the participant that their eligibility is *temporary, pending receipt of the required documentation within 30 days*.

- Finish the certification using “*Pending Proof*” in the drop-down menu for documentation of residency.
- Issue only **one month** of food benefits.
- Explain how the participant may provide that documentation and give them a reminder to:
 - Submit the pending proof electronically (email, text, etc.), or
 - Return the following month (or sooner) with the required documentation for additional benefits.
- Review the pending documentation when received and make a determination of eligibility.
 - Enter the information (e.g., what documentation was provided) into the participant record. Then delete/destroy any electronic documents received.
 - Issue food benefits if appropriate, or
 - Initiate ineligibility procedures if documentation will not be provided. See [Section 5.4: Notification of Ineligibility/Disqualification](#).
- Under no circumstances may a second 30-day temporary eligibility period be allowed.

Identity Requirements at various appointment types:

Initial certification:

- Proof of identity for the applicant
- In addition, if the applicant is an infant or child, identity for the parent/guardian or proxy is required.

Subsequent certification:

- Acceptable form of identification
- Photo ID for proxy unknown to staff
- Visual personal recognition by staff is acceptable

Nutrition education/Benefit issuance visit:

- An acceptable form of identification
- Photo ID for proxy unknown to staff
- Visual personal recognition by staff is acceptable
- When the contact is not in person, and there is doubt about the identity of the participant/parent/guardian, verify identity by asking at least two of the following:
 - The identity of the Authorized Representative (Primary Card Holder, PCH) or an Alternate Representative listed in the participant's record
 - The PCH's date-of-birth
 - The zip code of the household's mailing address
 - The names of household members participating in WIC

In-state transfers in a valid certification:

- An acceptable form of identification

Transfers in a valid certification from other states:

- Proof of identity for the participant
- If the participant is an infant or child:
 - The Verification of Certification (VOC) document may be used as proof of identity for the child
 - Proof of identity is required for the child's parent/guardian

Waiver - limited situations when a waiver may be used for lack of identity documentation

In limited circumstances, staff may determine that the applicant is in a situation in which written documents are not available. Examples might include:

- Fire
- Theft
- Disaster

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- Migrant families
 - Homeless individual or family
 - Applicant whose spouse or partner refuses to provide identity documentation (such as a birth certificate for a child)
1. Complete the certification using “*Waiver Signed*” in the drop down menu for the documentation of income.
 2. Print the *Certification Notice*. Have the participant/parent/guardian sign and indicate information they are unable to provide. Scan this form into the participant record.
 3. Assess the individual situation and issue the appropriate set(s) of food benefits that best meets the needs of the applicant.

Guidance

- Staff should assist applicants by suggesting ways to meet the identity requirement.
- For applicants known to staff, documentation of identity is still required at the initial certification. Staff should routinely ask, “Did you bring something with your name and address on it, such as a driver’s license or paystub?”
- Visual personal recognition by WIC staff at subsequent contacts may be allowed once initial proof of identity has been established.
- Applicants do not need to be US citizens to receive WIC services and food benefits.
- One document can be used as proof for multiple areas of eligibility including identity, residency and income. For example, a current pay stub or Phone/Online Medical Assistance verification could potentially serve as proof of identity, income and residency if it includes all those areas and is up-to-date.
- Contact your State Consultant with any questions or concerns regarding residency.

Reference – Complete Listing of Hyperlinks

Section 5.4: Notification of Ineligibility/Disqualification

(https://www.health.state.mn.us/docs/people/wic/localagency/program/mom/chsctns/ch5/sctn5_4.pdf)

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