



# STREAMLINED REMOTE CERTIFICATION OPTIONS

To help WIC agencies accomplish all of the steps in the certification process remotely and expeditiously, we suggest utilizing the methods outlined below. These methods generally require a **waiver** of the physical presence requirement as permitted under the Families First Coronavirus Response Act. Additionally, when WIC clinic staff is working from home, a **waiver** of separation of duties requirements in 246.4(a)(26) is needed so that a single staff person can conduct a telephone or video certification. Unless noted, these methods are allowed under current rules; where necessary, regulatory provisions that would need to be waived are specified.

## IDENTITY, RESIDENCY, AND INCOME DOCUMENTATION

To document identity & residency, use **one or more** of the following methods:

- » Obtain address from records accessed for adjunctive income eligibility when available (see next section)
- » Telephone:
  - » Secure method, such as email or text, for applicants to send photo or scanned image of identification/residence document or
  - » Document oral indication that no identification/residence document is available
- » Video:
  - » View identification document or
  - » Document oral indication that no identification/residence document is available

- » Online application:
  - » Secure document upload or
  - » Include statement for applicant to indicate when no document for identification/residence is available or unable to send

There is already a regulatory exception to income documentation when it would “present an unreasonable barrier to participation” (7 C.F.R. (d)(2)(v)(C)) but if FNS determines that does not cover the pandemic, use **this series of steps** to document income:

- » If applicant is receiving Medicaid, SNAP, and/or TANF cash assistance, use existing methods to confirm eligibility (automated telephone system, interface in WIC MIS, or separate online portal)
- » If not adjunctively income eligible, ask whether household has any income; households with no income do not have to provide any documentation under 7 C.F.R. §246.7(d)(2)(v)(C)
- » If not adjunctively eligible and household has income, ask whether the household has documentation; for households with none, document an oral explanation as to why (requires a **waiver** of the requirement that the explanation be written 7 C.F.R. (d)(2)(v)(C))
- » If not adjunctively eligible and household has income and documentation, use **one or more** of the following methods:

- » Secure method, such as email, text or document upload, for applicants to send photo or scanned image of income documentation,
- » View income documentation if using video, or
- » If applicant does not have the capacity to send or show documentation, include written explanation in an online application or document an oral explanation as to why (if oral, requires a **waiver** of the requirement that the explanation be written 7 C.F.R. (d)(2)(v)(C))

Use identity, residency, and income documentation provided at prior certification for recertification (requires a **waiver** of requirements in 7 C.F.R. § 246.7 (c) and (d)) to:

- » Recertify pregnant women as breastfeeding or non-breastfeeding postpartum
- » Certify infants born to women enrolled in WIC while pregnant
- » Recertify infants turning one year old to the child category

## NUTRITIONAL RISK ELIGIBILITY

Temporarily bypass conducting anthropometric measurements and blood tests, by using **one or more** of the following methods:

- » Accept self-reported weight and height information from within prior 60 days from women (requires a **waiver** of the requirement that a competent professional authority provide such information in 7 C.F.R. § 246.7(e))

- » Accept parent/caretaker report of infant/child measurements from health care appointments within prior 60 days (requires a **waiver** of the requirement that a competent professional authority provide such information in 7 C.F.R. § 246.7(e))
- » When health records are accessible (e.g., when WIC is part of a health care system), obtain measurements from within last 60 days and/or blood test values from within required time period
- » When information is not available, defer measurements and blood tests until an in-person appointment can be scheduled (requires a **waiver** as permitted under Families First Corona Response Act)

Prioritize health and dietary questions to gather information needed to determine category, appropriate food package, and to make referrals for health or social services (see examples below). When using:

- » Telephone or video: oral questions
- » Online application: include questions on application or on a separate form to upload

To determine nutritional risk eligibility:

- » Consider a pregnant woman who is income eligible to be presumptively eligible and certify without an assessment for nutritional risk for up to 60 days under 7 C.F.R. § 246.7 (e)(1)(v)
- » Determine at least one nutritional risk, which may include:
  - » Risk(s) identified through available information
  - » Presumed dietary risk

- » Regression for previously certified participants, when applicable (e.g., previous risks associated with measurements and blood tests)

*Sample questions related to food package*

Note that most questions would require follow-up via phone, video or email to gather additional information. Date of birth, collected as part of basic demographic information, would also be considered.

- » For All Categories:
  - » Are you/your child currently receiving medical care for an illness or health condition?
  - » Has a doctor or other health care provider told you to eat a special diet or certain foods?
  - » Are there specific foods you/your child cannot or do not eat?
  - » Which of the following do you have (that work):
    - » Stove?
    - » Oven/Microwave?
    - » Refrigerator?

- » For Women:
  - » Are you pregnant? What is your due date?
  - » Are you breastfeeding an infant up to one year old?
  - » Are you the mother of a formula fed infant up to six months old?

- » For Infants/Children:
  - » How are you feeding your baby? (Breastfeeding? Formula feeding? Combination of breastfeeding and formula feeding?)
  - » When applicable: Amount of formula fed per 24 hours?
  - » When applicable: What type of formula are you currently feeding your baby? (brand and forms)
  - » Do you have questions or concerns about feeding your baby/child?

*Sample questions related to referrals:*

- » Are you interested in applying for Medicaid, SNAP, or TANF cash assistance? [use response to questions about adjunctive eligibility to omit benefits already received]
- » Do you have a doctor or clinic for health care for you/your child?
- » Are you concerned about running out of food for your family?
- » Would you like to have information about help with alcohol or drug use?

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