

<p style="text-align: center;">Texas WIC Health and Human Services Commission</p>

Effective August 1, 2021

Policy No. CS:08.0

Adjunctive Income Eligibility

Purpose

To allow automatic income eligibility for the WIC Program for those applicants who are determined to be adjunctively income eligible.

Authority

7 CFR Part 246.7; 25 TAC §31.22

Policy

An applicant for WIC is adjunctively income eligible when the applicant is:

1. Certified as fully eligible to receive Supplemental Nutrition Assistance Program (SNAP);
2. Certified as fully eligible for Temporary Assistance to Needy Families (TANF);
3. Certified as fully eligible or presumptively eligible for Medicaid, including the Medicaid Healthy Texas Women Program;
4. A member of a household in which any eligible participant is certified as fully eligible to receive assistance under TANF; or
5. A member of a household in which any pregnant woman or infant is certified as fully eligible to receive Medicaid.

References to the Medicaid Program in this policy are inclusive of the Medicaid Healthy Texas Women (HTW) Program unless specified otherwise.

Definitions

Adjunctive income eligibility – income eligibility for individuals and certain household members who participate in the SNAP, TANF, or Medicaid program.

Automated Voice Response System (AVR) – is operated by the Texas Health and Human Services Commission (HHSC) and is available 24 hours a day

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through a toll-free number. If applicants know their TANF or SNAP case number but have brought an unacceptable HHSC form or no form at all, WIC LA staff may call 2-1-1 or 1-877-541-7905, select either TANF or SNAP and enter the applicant's case number to verify active status.

For clinic sites without a touch-tone phone, the AVR has voice recognition and the case number can be spoken and understood. This line is busiest between 11:00 AM and 3:00 PM, and particularly during the first week of each month when benefits are mailed. WIC LA staff may choose to call their local HHSC office if they are unable to reach the AVR system.

In order to determine eligibility, use the applicant's case number, not the balance/dollar amount of SNAP benefits since merely having a balance does not reflect the applicant's current status.

A Lone Star Card may be issued to a TANF or SNAP recipient for electronic benefits transfer (EBT). The Lone Star Card is not acceptable proof of participation in TANF or SNAP as there is no indication on the debit card if the card is still valid or active. In order to determine eligibility using the debit card, use the AVR system described above.

Household – all persons, related or unrelated, living together in the same dwelling, with the exception of the following special situations: foster child, individuals who qualify as a separate economic unit, and residents of a homeless facility or other residential institution. Participation in one of the three adjunctive programs for an infant/child placed by the DFPS must not be used by another member of the foster family's household for adjunctive income eligibility.

A SNAP recipient – one individual or a group of individuals who are determined eligible for benefits. Most SNAP forms are issued in the name of the head of household. Other unnamed family members may also be recipients. When an applicant/parent guardian is applying for an unnamed family member, the LA must verbally inquire if the unnamed family members are eligible to receive SNAP benefits. In such cases, the LA must

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accept documentation, which identifies that the head of the household and other unnamed family members are certified to receive benefits.

Presumptive eligibility – is granted to some Medicaid Program applicants, excluding the HTW Program, to confer a temporary eligibility status before they have completed the application process and have been determined fully eligible. Limited Medicaid benefits to pregnant women may be presumptively granted based on their categorical eligibility. Such recipients are removed from these programs if they are later determined to be ineligible once the application process has been completed. Although ultimately some clients may be determined ineligible, program data shows such persons characteristically prove to be fully eligible and this is not a frequent cause of persons ceasing to receive benefits under this program. Even when persons cease to be certified under this program, the possibility remains that they may still meet WIC income guidelines; therefore, WIC regulations allow for a client who is presumptively eligible for Medicaid to be considered income eligible for WIC benefits. After WIC certification, the client is not required to prove they were subsequently certified as fully eligible for Medicaid. There is no presumptive eligibility for SNAP, TANF, or the HTW Program.

Provider Help Desk for Your Texas Benefits Card (YTBC) – is operated by the Texas Health and Human Services Commission (HHSC) and can be reached at 1-855-827-3747. WIC staff may call the Provider Help Desk to verify current Medicaid eligibility when an applicant presents Your Texas Benefits Card as there is no indication on the card that the recipient is currently participating in the Medicaid Program. Staff should choose Option 3 – Non-Provider to enter the Medicaid number listed on the front of the Your Texas Benefits Card (YTBC) and the applicant’s date of birth. The system will indicate “eligible for services” or “not eligible for services”. Staff may also call the Provider Help Desk for YTBC to verify current Medicaid eligibility for applicants who know their Medicaid client identification number or whose number is on file but have brought an unacceptable HHSC form or no form at all.

YTBC – is issued to each person who participates in the Medicaid program. YTBC is not acceptable proof of current participation in Medicaid because the

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card does not reflect eligibility periods. Therefore, staff must verify participation in the Medicaid program as described in Procedure I.B. of this policy.

Texas Medicaid and Healthcare Partnership (TMHP) – is a secure portal to verify enrollment in Medicaid.

Health and Human Services (HHS) Outreach Report – a list of potential eligible clients who are:

- Adjunctively eligible (Medicaid, TANF, SNAP)
- Categorically eligible
- Unduplicated, not a current WIC participant

Provisional Certification – a 30-day certification and up to 30-days benefit issuance for an applicant/participant who meets all eligibility criteria at certification but fails to bring one of the acceptable proofs of identification, residency or income.

Disaster Expedited Certification – a certification process where anthropometrics and blood work are optional but must be obtained within 90 days from certification. This is allowed during a disaster situation.

Procedures

- I. When determining income eligibility staff must inquire if the applicant is fully eligible to receive SNAP or TANF benefits, or fully/presumptively eligible to receive regular Medicaid benefits or fully eligible to receive Medicaid HTW benefits.

If the applicant is not eligible for benefits from one of these three adjunctive programs, the LA must inquire if the applicant is a member of a household that is fully eligible to receive TANF or a member of a household in which a pregnant woman or an infant is fully or presumptively eligible to receive Medicaid.

- A. Adjunctive eligibility must be determined at each certification.

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- B. Current status must be determined by:
1. Visual review of acceptable documentation provided by participant
 2. Inquiry by phone or on-line computer system by the local agency for the SNAP, Medicaid Program, or TANF Program may be used when an applicant cannot provide documentation of their current eligibility status for SNAP, Medicaid, or TANF benefits or presents YTBC. LA staff must obtain verbal permission from the applicant to conduct the phone or online inquiry.
 - a. SNAP and TANF can be verified through the HHSC Automated Voice Response System (AVR) at 2-1-1 or 1-877-541-7905. Staff should select Option 1 for English or 2 for Spanish, and then select Option 2 - Benefit Information. Select Option 1 for all Medicaid, SNAP and TANF information. Once prompted enter in client's information and select Option 1 again to hear benefit status (stay on the line to talk to a representative).
 - b. Medicaid eligibility can be verified through the Provider Help Desk for YTBC at 1-855-827-3747 or TMHP.
 - i. Forms viewed or obtained electronically can be accepted if they clearly indicate the applicant is eligible for one of the adjunctive programs.
 - ii. HHS Outreach Report – serves as proof of adjunctive eligibility for a three-month period, beginning with the month listed on the report (this is the month participant is 'certified' as adjunctively eligible).
 3. Documentation from only one of the three adjunctive programs is required per applicant. Check the box under 'Is Proof available?' to indicate the eligible program(s). Program Enrollment Number (client ID or case number – HHS Outreach or enter 55555555 if unknown) must be entered for the

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program used for eligibility. A copy of the electronic document is not required for the participant's file.

4. Participation in the HTW Program is documented as Medicaid.
5. Applicants eligible to receive SNAP benefits must provide one of the following:
 - a. proof showing the applicant himself/herself is eligible to receive such benefits. Minors applying for themselves who reside with their parents and provide proof the parent is eligible to receive SNAP benefits (LA staff must verbally inquire if the applicant is eligible to receive SNAP) must be considered adjunctively income eligible as they are considered in the economic unit.
 - b. proof showing the parent/guardian applying on behalf of an infant or child receives such benefits for himself/herself or any household member.
 - i. A newborn infant who becomes part of a SNAP household must be deemed adjunctively income eligible for WIC.
 - ii. Other household members must be considered adjunctively income eligible if the parent/guardian states the family/household members are certified to receive SNAP benefits. If the other household members are not certified to receive SNAP benefits, the LA staff must determine if the household members are eligible under another adjunctive program or follow procedures of [CS:07.0 Income Screening as a Certification Requirement](#).
 - c. proof showing the applicant resides with the parent/guardian named as the SNAP head of household if the WIC applicant himself/herself is not specifically named on the form.

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- i. For applicants or parent/guardians applying on behalf of a child, compare the proof of residency provided by the applicant or parent/guardian to the address on the SNAP form for the head of household. The two addresses must match; or
 - ii. if the applicant or parent/guardian applying on behalf of a child does not have proof that their address matches the address of the SNAP head of household, the adult must provide a signed written statement confirming the living arrangements. Staff must scan and upload the signed written statement to the Family Page.
6. Applicants eligible to receive TANF or eligible/presumptively eligible to receive Medicaid benefits as applicable must provide proof. HTW eligibility can only be used for adjunctive income eligibility by postpartum and breastfeeding women. Proof of Medicaid for participant must be accepted regardless of who is listed as the parent/guardian and regardless of Department of Family and Protective Services (DFPS) Placement.
7. Applicants applying for WIC based on a household member's eligibility for TANF or Medicaid, excluding the HTW Program, must provide one of the following:
 - a. proof showing a pregnant woman or infant household member as a Medicaid recipient or the household member's eligibility for TANF; and

Note: A pregnant woman can provide any current acceptable Medicaid document to qualify another member in the household. The Medicaid would not have to specify that it is Pregnant Medicaid. A pregnant woman's Medicaid eligibility ends on the last day of the second month following the month the pregnancy terminates; therefore,

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her infant could be determined eligible based on the mother's Medicaid until two months of age. The infant's presumptive eligibility may be used to adjunctively certify other household members. A fully eligible infant can also adjunctively qualify other household members. The infant and other household members must be certified for a full certification period.

Example: Infant is born May 5th. Mother's Medicaid ends on July 31st. Infant is adjunctively income eligible if application to WIC is on or before July 31st. Household members can be enrolled using the infant's presumptive Medicaid eligibility if the application to WIC is on or before July 31st. Document the name of the adjunctively eligible participant in the MIS.

- b. proof showing the applicant resides with the TANF or Medicaid recipient:
 - i. applicant's or parent/guardian's proof of address (utility bill, etc.) must match the address of the TANF or Medicaid recipient shown on the form; or
 - ii. if the adult applying for herself or a child does not have proof that their address matches the address of the TANF or Medicaid recipient, the adult must provide a signed written statement confirming residency. Staff must scan and upload the signed written statement to the Family Page.

II. Persons determined income eligible for WIC under this policy must meet the eligibility criteria for program participation outlined in [CS:01.0 \(T\) Eligibility Criteria for Program Participation](#).

III. Provisional Certification (30 days) must be offered to an applicant who does not provide all required proofs at the time of the certification

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appointment but meets all other eligibility criteria and applicable documentation requirements.

- A. If the applicant/parent/guardian meets all other eligibility requirements:
 - 1. The MIS will allow up to 30-day benefit issuance.
 - 2. If the applicant/parent/guardian returns with the correct proof within 30 days and is found eligible, the MIS will establish the certification period.
 - 3. If the applicant does not return within the 30 days with the correct proof, the applicant is ineligible and automatically terminated by the MIS.
 - B. Under no circumstances shall a second subsequent Provisional Certification be applied if the applicant fails to provide the required documentation within the 30 days.
- IV. Staff must document in the MIS the household size and verbally declared monthly income on the participants determined adjunctively eligible. Applicants are not required to provide proof of income, such as: paycheck stubs, tax records, or bank statements, etc. The applicant is still adjunctively income eligible even if their income exceeds the WIC income guidelines.
- V. Staff must document participation in all adjunctive programs in the MIS for each applicant. Analysis of this data will be used by the United States Department of Agriculture (USDA). (Note: A copy of the adjunctive program document is not required.)
- VI. The LA has no responsibility to verify the continued eligibility of the participant in their respective adjunctive program(s) during the current WIC certification period.

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- VII. If the participant applies for subsequent certification at the end of the current WIC certification period and is not adjunctively income eligible the applicant must be screened in accordance with [CS:07.0 Income Screening as a Certification Requirement](#) for income eligibility.
- VIII. Participants are not required to report income changes within certification periods nor are LAs required to inquire about such changes. However, during a certification period, if the LA receives information from any party regarding a change in income eligibility, a reassessment of program eligibility must be conducted during the certification period unless the information concerns possible program fraud or abuse. When fraud or abuse is suspected at any time during the certification period, refer to [GA:12.0 \(T\) Participant Violations](#) for instructions on reporting to the state agency. Reassessments are not required when there are 90 days or less before the expiration of the certification period. If the individual is determined ineligible, the LA must disqualify the individual and any other family members participating in WIC at the time of the reassessment.
- A. Some examples of situations which trigger a mandatory reassessment when using adjunctive eligibility through Medicaid, TANF or SNAP include:
1. household member certified, and adjunctive eligibility has changed; or
 2. a change in custody, excluding DFPS placements, and/or
 3. a change in household size.
- B. The participant must provide proof of their continued eligibility in the Medicaid, TANF, or SNAP program or proof of income to their next appointment:
1. The individual must be issued one month of benefits and be required to provide written documentation to the next appointment.

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2. If the client fails to provide proof of continued participation in the adjunctive program or proof of income, the individual and any other household members participating in WIC at the time of the reassessment must be disqualified from the Program.
 3. Any reassessment must determine:
 - a. If the individual is certified as eligible to participate in either Medicaid, TANF, or SNAP programs; or
 - b. If the individual is a member of a household which contains a person certified as eligible to receive TANF or a member of a household in which a pregnant woman or an infant is certified as eligible to receive Medicaid; or
 - c. If the individual is income eligible under the procedures of [CS:07.0 Income Screening as a Certification Requirement](#).
- C. Medicaid does not need to be reassessed if Medicaid benefits remain in participant's name.

Guidelines

The HTW Program provides a limited Medicaid-paid family planning benefit to women ages 18-44 with income at or below 185 percent of the federal poverty level. Only citizens and some immigrants are eligible. Benefits include an annual family planning exam and choice of contraception for 12 months. A pregnant woman is not eligible for HTW; since Medicaid confers adjunctive eligibility to other family members only if the HTW recipient is a pregnant woman or infant, receipt of HTW cannot confer adjunctive income eligibility to family members applying for WIC. For more information go to: <https://www.healthytexaswomen.org/>.