



## GROUP SESSION LEADER'S GUIDE – INCOME ELIGIBILITY

### Session Focus:

**Target Audience:** WIC staff overseeing or performing income determination.

**Session Goal:** To inform WIC staff of the updated guidance with regard to income eligibility determination.

**Session Objectives:** By the end of the session staff will be able to...

- 1) Review what is considered income and how to determine the economic unit.
- 2) Identify how to document and verify income.
- 3) Review 30-day temporary certification procedures.

### Session Planning:

**Materials Needed:**

**Staff handouts:**

- Q&A Sheet

**Materials for session leader:**

- WIC Connects Group Session Leader's Guide – Income Eligibility (this leader's guide)
- Income Eligibility PowerPoint

**Additional resources for session leader:**

- Policy manual - IWPPM, Ch. 4, Section B
- Income Guidelines for WISPr documents (available on the WISPr homepage or IWPPM 4-B-9)
- Policy memorandum #2013-4
- Federal WIC regulations Section 246.7(d)

**Preparation Needed:**

- Participate in the LA Coordinator train-the-trainer conference call on February 12, 2015 2:00-3:00 pm MT.
  - Call in number 888-706-6468, participant code 811393.
- Review materials in advance of the group training session.

Prior to leading the in-service session, spend time reflecting on how you can model participant centered services (PCS) skills throughout the session. Read the in-service outline below and think about where you might use open-ended questions (see the activities), affirmations (affirm staff for their comments/answers during the session), reflections (acknowledge when the group seems apprehensive, excited, confident, etc.), and summarizations (anywhere it seems to fit during the session discussions). At the conclusion of the PowerPoint presentation session, determine the "next steps" (see slide 29 below) and summarize.

## Session Outline:

Facilitator notes – total time needed about 60-90 minutes (depending on questions and discussion time)

PPT Slide:	Important concepts to cover and learning activities
Slide 1	<b>Opening the session:</b> introduce the topic, length of session, invite questions as they arise.
Slide 2	<b>Objectives:</b> Review the session objectives (see above or see slide).
Slide 3	<p><b>Income Eligibility Guidance - Overview:</b> Review the overview to income eligibility guidance (see slide).</p> <p><u>Slide talking points:</u></p> <ul style="list-style-type: none"> <li>• This presentation focuses on traditional income calculations.</li> <li>• Previous guidance on the interpretation of the policy has been updated or clarified (for example, temporary certs).</li> </ul>
Slide 4	<p><b>Income Eligibility Guidance -Discussion Activity:</b> Have the group discuss or propose questions they have about income.</p> <p>Question: <i>What questions do you have about income eligibility?</i> Leader may list group answers on a board or flipchart, etc.</p> <p>Keep questions visible as the leader may follow-up on slide 30 (Questions) to see if questions have been answered during the presentation and/or still need to be answered.</p>
Slide 5	<p><b>Income Eligibility Guidance:</b> Discuss what is considered income and the definition.</p> <p>Note specific sources of income included and excluded are contained in the IWPPM, Chapter 4, Section B (see slide).</p> <p>Leader may want to use policy manual as a reference or tool when discussing slides 5 &amp; 6.</p>
Slides 6-7	<b>Income Eligibility Guidance- Loans:</b> Review loans and how some may be considered other cash income while others are excluded (see slide).
Slides 8-13	<p><b>Income Eligibility Guidance- Current vs. Annual:</b> Explain the definition for current income and how Idaho WIC defines current income (see slide 8-9). Discuss examples when current, prospective or annual income may be recommended (see slides 10-13).</p> <p><u>Slide talking points (slide 9):</u></p> <ul style="list-style-type: none"> <li>• In order to ensure consistency and accountability among and within State agencies, 30 days of income is recommended.</li> <li>• The reason for the minimum 30-day recommendation is to get an accurate reflection of the applicant’s income status.</li> <li>• Note: YTD on a pay stub should not be considered annual.</li> </ul> <p><u>Slide talking points (slide 10):</u></p> <ul style="list-style-type: none"> <li>• If you anticipate that income loss may be temporary, a temporary or 30-day certification can be issued. (This is different than normal situations where we encourage normal certification with maximum issuance of benefits.)</li> </ul>

	<p><u>Slide talking points (slide 11):</u></p> <ul style="list-style-type: none"> <li>• This handout provides guidance on income calculation. This is how WISPr calculates income automatically and then compares it to the income guidelines (in a table within WISPr).</li> <li>• It is a reference if staff has to calculate different amounts of pay to enter into WISPr or manually calculate if WISPr is down.</li> <li>• Staff should enter information into WISPr and allow WISPr to calculate. Staff may want to enter the multiple paystub amounts under the notes section for reference when they have to calculate different amounts to be entered into WISPr.</li> <li>• With traditional income, if a family with multiple incomes is paid at different frequencies, staff does not have to change them to the same frequency. Enter the frequency and/or amount into WISPr and let WISPr calculate it. (Example: One adult is paid monthly and the other is self-employed, so annual is used from tax info. Enter them separately into WISPr “as is.”)</li> <li>• This also gives further guidance at the bottom to calculate income in the event one month does not best reflect the participant’s situation.</li> </ul>
<p><b>Slide 14</b></p>	<p><b>Income Eligibility Guidance- Self-employment:</b> Discuss income determination for self-employed applicants (see slide).</p> <p><u>Slide talking points:</u></p> <ul style="list-style-type: none"> <li>• Because income and expenses can vary dramatically from month to month or season to season, even if it is November, staff should use the most recent completed tax return.</li> <li>• Since it is not staff responsibility to challenge or recalculate the amount on the tax return, staff shouldn’t ask applicants to bring in other documents such as bank records or statement of loss. It is the responsibility of the IRS.</li> </ul>
<p><b>Slides 15-16</b></p>	<p><b>Income Eligibility Guidance- Zero Income:</b> Discuss income determination for applicants who report zero income (see slide).</p>
<p><b>Slides 17-20</b></p>	<p><b>Income Eligibility Guidance- Income Documentation:</b> Discuss income documentation requirements and what to do when income cannot be reviewed (see slides 17-20).</p> <p><u>Slide talking points (slide 17):</u></p> <ul style="list-style-type: none"> <li>• Documentation substantiating reported income for all members of the economic unit must be provided as part of the WIC certification process.</li> <li>• It may be helpful to include additional details if applicable under the “notes” area.</li> </ul> <p><u>Slide talking points (slide 19):</u></p> <ul style="list-style-type: none"> <li>• If a note from family is used, you may ask them to deliver the letter at the visit to include contact information to reach and verify the letter/third party involved</li> </ul> <p><u>Slide talking points (slide 20):</u></p> <ul style="list-style-type: none"> <li>• Ideally all proof of documents will be collected and consistent with the policy manuals allowable proofs in IWPPM Chapter 4. However, it is understandable that there are limited circumstances where other documentation is used outside of the commonly collected proof documents.</li> <li>• In the event another form of documentation is accepted, then documentation is required in WISPr of what was collected. Staff should still seek approval (Supervisor or Coordinator) to ensure the document is allowable.</li> <li>• In addition to income, this also applies when “other” is selected for ID or residency proof.</li> <li>• If staff document what was reviewed, then hard copies of the documents <i>do not</i> have to be saved in the chart.</li> </ul>

	<ul style="list-style-type: none"> <li>• Staff should consider details of the documents that are pertinent to record in WISPr. <i>Note: Recommend to document other income documents in the notes section within the income page, but each agency may decide where to document proof details such as staff notes etc.</i></li> <li>• If the participant has made an effort to provide proof documentation or simply does not have them, then a No Proof form may be appropriate.</li> </ul>
<b>Slide 21</b>	<p><b>Income Eligibility Guidance- Income Verification:</b> Discuss income verification and how that differs from documentation (see slide).</p> <p><u>Slide talking points:</u></p> <ul style="list-style-type: none"> <li>• They are not used interchangeably.</li> <li>• External sources include employer verification of wages, local welfare office verification, etc.</li> <li>• State and local agencies must use their discretion in deciding when it is appropriate to verify.</li> <li>• Consent for such verification is contained in the rights and responsibilities statement and signed by all applicants.</li> </ul>
<b>Slides 22-24</b>	<p><b>Income Eligibility Guidance- Lack of Income Documentation:</b> Review what local agency staff should do when a participant lacks documentation (see slides 22-24).</p> <p><u>Slide talking points (slide 22):</u></p> <ul style="list-style-type: none"> <li>• Documents acceptable by the Idaho WIC program for residency and identity are listed under IWPPM, Chapter 4, Section B, pages 4-5.</li> <li>• In the case of a 30-day shortened certification, it is important that there is consistent application across local agencies about when a 30-day certification is offered to an applicant.</li> </ul> <p><u>Slide talking points (slide 24):</u></p> <ul style="list-style-type: none"> <li>• An applicant who fails to bring in ALL of the required documentation (residency, identity or income) may not receive a second subsequent 30-day certification period (cannot keep extending 30 days back to back if proof is continually forgotten- this <i>does not</i> mean a participant can only ever have one 30-day temporary certification).</li> <li>• Note with proof of pregnancy, a participant has 60 days to provide proof and there is also the option for visual proof to be used if applicable (IWPPM4-B-3).</li> </ul>
<b>Slide 25</b>	<p><b>Income Eligibility Guidance -Discussion Activity:</b> Have the group discuss avoiding temporary certification and then brainstorm how to improve return of missed documentation when we can't avoid a temporary certification. Leader may list group answers on a board, flipchart, etc.</p> <p>Questions:</p> <ul style="list-style-type: none"> <li>• <i>What has worked well to avoid 30-day temporary certifications?</i></li> <li>• <i>How can WIC help ensure missing documents are brought in before the 30 day cert ends once a temporary certification has been given?</i></li> </ul>
<b>Slides 26 &amp; 27</b>	<p><b>Income Eligibility Guidance- Family/Household/Economic unit:</b> Discuss how to determine the Family/Household/Economic unit (see slides 26 and 27).</p> <p><u>Slide talking points (slide 26):</u></p> <ul style="list-style-type: none"> <li>• Determining the size of the economic unit is a critical element of income eligibility determination in the WIC program.</li> <li>• Given this essential element, the local agency must decide whether the available income is adequate to sustain the economic unit.</li> </ul>

<b>Slide 28</b>	<p><b>Income Eligibility Guidance- Adjunctively Eligible:</b> Review the policy for AE and how that is different than traditional income (see slide).</p> <p><u>Slide talking points:</u></p> <ul style="list-style-type: none"> <li>• Staff does not have to review pay stubs for verbal income.</li> <li>• Clarify that being on another program does not make them qualify for the program, but makes them income eligible. For example, an individual who does not provide proof of ID will still have to be temporarily certified even if they are AE with Medicaid.</li> <li>• If the individual still reports zero after staff have made an effort to collect an estimate, staff may enter zero, but should document why zero is being entered.</li> </ul>
<b>Slide 29</b>	<p><b>Income Eligibility Guidance- Summary:</b> Provide a brief overview of what was discussed (see slide).</p> <p><u>Slide talking points:</u></p> <ul style="list-style-type: none"> <li>• Much of what we have discussed today is not new policy.</li> <li>• In order to maintain the integrity of the WIC program, it is important that WIC local agencies uniformly and consistently apply WIC policy and regulations.</li> </ul>
<b>Slide 30</b>	<p><b>Questions:</b> Before closing, check that the question(s) have been answered from the activity in slide 4 (<i>What questions do you have about income eligibility?</i>).</p> <p>Review answers and provide responses to questions that were unanswered. If staff has feedback or unanswered questions, please contact the State office.</p> <p><b>Thank you for participating!</b></p>

**Facilitator review:**

How well did the session support certifier understanding of income eligibility?

What suggestions do you have for the State office regarding future training and related materials?

Feedback may be given to:

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