



Procedure: Income Determination & Documentation

Functional Area: VIII Certification, Eligibility & Coordination of Services

Section: A 6

Approval Date: 11/18/2016

Citation: 246.7(c), (d), & (i)(5)(i-iii)

Revised Date: 11/2019

Purpose	To provide guidance on determining and documenting income.
Income Definition	Income includes total gross cash earned by any and all members of a household or economic unit. It also includes any amount received or withdrawn from any source, including savings.
Gross Income Definition	Gross income is defined as all income before deductions are made for income taxes, employee social security taxes, insurance premiums, bonds, etc.
Net Income Definition	Income after all expenses and depreciation are deducted. Net income is used to determine income for self-employed persons and farmers.
In-Kind (Cashless) Definition	<p>Any benefit which has a monetary value and is received in place of money for services rendered. Examples included: housing, utilities, vehicles, food and gas provided or paid by employer.</p> <p>In-Kind benefits are not counted as income.</p> <p>See the Income Determination – Special Circumstances procedure for more detail about specific in-kind situations.</p>
Income Documentation	Documentation (proof) of each source of income for a family/economic unit must be shown at the time of certification.
Who May Provide Income Documentation	<p>The following are allowed to bring income documentation to the clinic for eligibility purposes:</p> <ul style="list-style-type: none">• Applicant/client• Authorized Representative <p>Proxies are not allowed to provide documentation of income for purposes of enrollment.</p>
Income Verification	WIC does not require income verification, that is, validating the information provided at the appointment through an external source of information other

**Income Verification
(cont.)**

than the applicant.

Verification of income would only be done when staff have reason to believe the family has other sources of income that were not reported or the family's income or family size was under reported.

**Income Listing and
Acceptable Proof**

The following table lists what is included as gross income, and the corresponding examples of acceptable proof.

All proof of income must be current, i.e.: within the last 30 days.

GROSS INCOME INCLUDES	PROOF OF INCOME INCLUDES
Monetary compensation for services, including wages, salary, commissions, or fees	<ul style="list-style-type: none">• Current pay stub(s) noting the pay time frame (weekly, bi-weekly, monthly, etc.)• Signed statement from employer indicating gross cash earnings for a specified period.
Active military payments	<ul style="list-style-type: none">• Recent Leave and Earnings Statement, including CONUS COLA (Continental U.S. Cost of Living Allowance)
Net income from farm and non-farm self-employment	<ul style="list-style-type: none">• W-2 forms or income tax return for the most recent calendar year. Line 7 on Form 1040.• Accounting records for the self-employed
Social Security benefits	<ul style="list-style-type: none">• Check stub/award letter from Social Security stating current amount of earnings/bank statements.
Dividends or interest on savings or bonds, income from estates, trusts, or investments	<ul style="list-style-type: none">• Income tax return for the most recent calendar year• Bank or account statements
Net rental income	<ul style="list-style-type: none">• Income tax return for the most recent calendar year
Public assistance or welfare payments; foster care	<ul style="list-style-type: none">• Notice of Action• Foster child placement letter/foster parent award letter.
Unemployment compensation	<ul style="list-style-type: none">• Unemployment letter/notice
Government civilian employee or military retirement or pensions or veteran's payments	<ul style="list-style-type: none">• Annual statement that shows monthly amount of retirement income
Private pensions or annuities	<ul style="list-style-type: none">• Income tax return for the most recent calendar year
Alimony or child support payments	<ul style="list-style-type: none">• Divorce decree• Award letter• Copy of check received

Disability Payments	<ul style="list-style-type: none"> • Check stub/award letter stating current amount of disability received/bank statements.
Unemployment	<ul style="list-style-type: none"> • Award letter stating current amount received • Bank statements
Workers Compensation	<ul style="list-style-type: none"> • Pay Stub showing benefits received • Bank statements • Award letter/notice showing settlement amount for wages
Regular contributions from persons not living in the household. Includes payments for rent & utilities or money sent/given to family from person living in another location.	<ul style="list-style-type: none"> • Letter from person contributing resources to the household • Canceled check showing amount contributed to household • Bank statement showing deposits
Other cash income: Includes, but is not limited to withdrawals from any source, including substantial savings accounts which families are drawing upon (similar to a trust account), investments, trust accounts and other resources readily available to the family	<ul style="list-style-type: none"> • Bank or account statements indicating regular draws on the account(s)
Net royalty payments: such as payments received for writing a book; use of property; extraction of oil, gas, minerals from your property, use of your name.	<ul style="list-style-type: none"> • Income tax return for the most recent calendar year • Bank statement showing deposits • Letter from source showing amount and date received
Census Income for 2010 Census	<ul style="list-style-type: none"> • Check Stub or Bank statement

Income Exclusions

The following table lists exclusions to the WIC income definition.

WHAT CANNOT BE COUNTED AS INCOME:	EXAMPLES:
Assistance Received From Federal Programs	Medicaid, Food Stamps, School Lunch, Family Day Care Food Program, Child Care and Development Block Grant payments, public housing, home energy assistance, youth employment programs, relocation assistance, certain submarginal land of the U.S. which is held in trust for certain Indian Tribes.
Child's Income	Occasional earnings, such as: income from babysitting, mowing lawns.
Gifts	Periodically given
Loans	Which must be repaid

Lump-Sum	Insurance payments for fire and flood damage to a house, if used for replacement. Insurance payments, including workers compensation for past or future medical expenses. Payments received by property owners from National Flood Insurance Program (NFIP). Payments under the Disaster Relief Act of Disaster Relief and Emergency Assistance.
Military Cost of Living Allowance (O CONUS COLA)	For military staff living overseas. Listed as O CONUS COLA (Overseas Continental U. S. Cost of Living Allowance) on the pay stub.
Military Family Housing Allotment - BHA, BMA, LQA, MIHA, OHA, TLA, TLA, OCONUS	Cash housing allowances for military services personnel residing off military installations or in privatized housing whether on or off base. The value of inkind benefits for housing on or off base. Listed as Basic Housing Allowance on pay stub.
Military Family Subsistence Supplemental Allowance - FSSA	For stateside & overseas military families who are below 130% poverty level. Listed as FSSA on pay stub.
Military Combat Pay	Payments that are received: <ol style="list-style-type: none"> 1. When serving in a designated combat zone. and that are first received 2. After they were deployed to the designated combat zone. and are received 3. In addition to base pay.
Military Veteran' Educational Assistance Act mandatory salary reductions	
Deployment Extension Incentive Pay (DEIP) and Deployment Extension Stabilization Program (DESP)	Payments received while deployed. Payments received while at home station must be counted as income.
Agent Orange Compensation payments	
Wartime relocation of Civilians payments	
Filipino Veterans Equity Compensation Fund payments	
Old Age Assistance Claims Settlement payments	Except for per capita shares in excess of \$2000
Non-Cash Benefits	Employer paid portion of health insurance and other employee fringe benefits, food or rent received in lieu of wages, the value of

Non-Cash Benefits (cont.)	food and fuel produced and consumed on farms.
In-Kind	The value of any non-cash compensation. Examples: housing provided to ministers or ranch workers. Meat/food provided to farm or ranch workers.
Payment to Volunteers	<ul style="list-style-type: none"> • Under Title I (Vista, etc.) • Under Title II (Retired Senior Volunteer Program, Foster Grandparents, etc.) • Under the Small Business Act
Payments Received Under the Job Training Partnership Act	
Student Financial Assistance	For any program funded under Title IV, including the Pell Grant, Supplemental Educational Opportunity Grant, State Student Incentive Grants, National Direct Student Loan, PLUS, College Work Study, and Byrd Honor Scholarship programs. Scholarships and grants. Payments received under Carl D. Perkins vocational and Applied Technology Education Act.
Earned Income Tax Credit refund/payment	Tax Forms
Medicare prescription drug card subsidies.	Any subsidy that a household receives through the prescription drug discount card program

Current Income Definition

Current income is income received by a household during the month prior to the individual's application.

Annual Income Definition

Annual income is income received by the family/household during the past 12 months.

Timeframes for Determining Income

Both the income earned by the family during the past 12 months and the current rate of income should be considered to determine which is the better indicator of income that the household is receiving at this point in time.

Exceptions to Using Current or Annual Income

The exceptions to using either the income over the past year or current income are:

- Persons from families with adult members who are unemployed (including laid-off workers) must have their income eligibility determined using their current rate of income
- In-stream migrant farmworkers (and their families) with expired Verification of Certification (VOC) cards must be considered income-

Exceptions to Using Current or Annual Income (cont.)

eligible, provided that their income is re-determined once every 12 months.

- Anticipated income if a person thinks he/she will get a job. Use the income they have now if unemployed or in the past 30 days if they are currently employed.
- Clients who have started a new job, but hasn't yet received pay. Use the income they received in the past 30 days.

Do not count this income. Only income that has actually been received may be counted.

Staff should tell clients who are anticipating a new job, that if their income changes substantially they should notify clinic staff at that time.

Temporarily Low or Infrequent Income

Income determination for a family with temporary low or infrequent income is based on an average of the family's income during the period of infrequency or irregularity of employment. Families who might be in this category can include, but are not limited to, construction workers, seasonal agricultural workers such as farmers, or self-employed persons, persons on maternity leave.

Temporary Lack of Income

Persons who are not receiving any income should have their eligibility determined based on their current rate of income. Clients who this affects are:

- Those who are currently unemployed and not receiving unemployment benefits.
 - Those who are temporarily laid off and expect to be called back to work in the future.
 - Workers on strike
-

How to Calculate Income

When a household has only one income source, or if all sources are paid at the same interval, do not use the conversion factors below. Compare the income, or the sum of the separate incomes, to the WIC income guidelines for the appropriate interval and household size to make the income eligibility determination.

For households that have income sources at more than one interval, (ex. boyfriend is paid weekly and mom receives disability monthly), use the following steps to determine the family's income.

1. Convert each income to annual amount:
 - Take the weekly income and multiply times 52.
 - Bi-weekly (every other week), income should be multiplied by 26.
 - Semi-monthly income should be multiplied by 24.
 - Monthly income should be multiplied by 12

***DO NOT round the values resulting from each conversion**

2. Add together all the unrounded, converted incomes
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How to Calculate Income (cont.)

3. Compare the total to the annual income listed for the appropriate family size shown in the income guidelines.

The income calculator in Journey automatically converts income to an annual amount for all payment options.

One Person in Family Certified and Found Over Income

When any member of a family or household is found to be over income during a certification visit, ALL members of that family or household are to be considered over income.

Exceptions are:

- children who are adjunctively income eligible as recipients of Medicaid, SNAP or ADC.
 - members of households with a pregnant woman or infant receiving ADC, Medicaid or SNAP.
-

One Time Payments

Payments received once, such as clothing allowances, small lottery winnings, and re-enlistment/hiring or other bonuses are counted as income only during the month they are received.

Families who receive these types of lump sum payments generally use them to pay bills and other expenses during the month they are received and the money is not available after this for the family's use. Families who receive these payments and are over the income guidelines are ineligible for WIC during the month they receive the lump sum payment. They may reapply/receive benefits in months following where no payment is received provided their income meets or is below the guidelines.

Please contact the state WIC office for guidance when you have a one time payment over \$10,000.

Larger lump sum payments, such a lottery winnings in the tens or hundreds of thousands of dollars or those paid over multiple years are counted as income and averaged over a 12 month period in the year paid.

Proof of Adjunctive Income Eligibility

If the applicant reports they receive SNAP, ADC, Medicaid, or Kids Connection, staff should contact DHHS or have the client log into Access Nebraska to confirm participation in one or more of these programs.

When staff are unable to verify participation in one of the above programs, income should be screened the same as for other clients.

If the person cannot prove they are receiving benefits from one of the adjunct eligible programs and are over income when screened using the Income Questions or they do not have proof of income, they would be denied benefits at that time. Eligibility would be reassessed when proof of participation in one of

**Proof of Adjunctive
Income Eligibility (cont.)**

the approved programs is provided, or proof of income is brought to clinic

If the applicant meets income guidelines the certification visit would continue.

**Clients Who Do Not
Bring Proof to
Certification Visit**

There are instances when an applicant may be a walk-in or otherwise fail to bring proof of income to the certification appointment. When this happens a client may return the same day, if feasible, or have an appointment scheduled for another day depending on the clinic schedule, clinic staffing and the client's preferences.

A new certification process must be started for clients who do not return on the same day.

Walk-in clients must have an appointment scheduled within the processing timeframe for their status/situation.

**Applicants Unable to
Provide Proof of Income**

There are applicants who may be unable to provide proof of income. Examples of these situations are homeless families, those with no income, persons who are paid with cash, migrant farm workers, and undocumented workers.

Two options exist for WIC staff to use in these situations:

Option 1: Someone who has knowledge of the applicant's income (i.e. caseworker, employer, or pastor) may complete a Nebraska WIC Program Income Letter for the applicant. The letter may be found at the end of this procedure.

The letter should be scanned in the applicant's record and documented using the appropriate choice from the drop down list in the income panel of Journey.

Option 2: If staff determines that requiring the applicant to provide income documentation would present an unreasonable barrier to participation, the applicant may self-declare their income.

In these instances the Affidavit option should be completed in the Income panel of Journey. The reason why the applicant could not provide documentation of income should be chosen from the reason drop down menu in the income panel of Journey.

**Applicants Reporting
Zero Income**

Except in very rare cases, zero income is not an acceptable statement of income.

Situations when zero income would be acceptable are:

- Homeless and living in a shelter, car, park, etc.
 - Domestic abuse
 - Self-employed or farmers (zero or negative income on 1040 tax statement)
-

Applicants Reporting Zero Income (cont.)

- Unemployed and not receiving unemployment or severance pay

In these cases document zero income from the drop down menu in Journey and chose the appropriate reason for the zero income.

When zero income is reported in other situations, the applicant should be asked to describe in detail their living circumstances and how they obtain basic living necessities such as food, shelter, medical care, cell phone and clothing. It is especially important in these cases to review income information with the applicant to determine how the applicant is supported and identify any needed referrals.

Leading questions such as where are you getting food, where are you living, who is paying the rent or mortgage payments, how do you pay for your cell phone and/or gas and how long has the family been without income will give insight into how the applicant is supported. Let the applicant know that you are not trying to pry into his/her personal life, but that the information is necessary to determine income eligibility for the Program.

Applicants Reporting Negative (Net Loss) Income

When an applicant shows no profit or a loss for a year (i.e. farmers, self-employed), be sure to document in the Income panel of Journey an explanation of the individual's income (i.e. individual shows loss of \$5,000, existing on farm loans).

Reassessing Income Eligibility Mid Certification

A participant's income eligibility must be reassessed during the certification period when information is received:

- About a change in circumstances indicating possible income ineligibility, including family size.
- Indicating that a change in income eligibility has occurred.
- That confirms the individual or other eligible family member is no longer participating in Medicare, SNAP, Kids Connection, or TANF/ADC or other program that was used to determine a participant adjunctively eligible.
- From an outside source that indicates the family's circumstances have changed or that not all information relating to income and/or family size was reported at the certification visit.

Exception to Reassessment of Income Eligibility Mid Certification

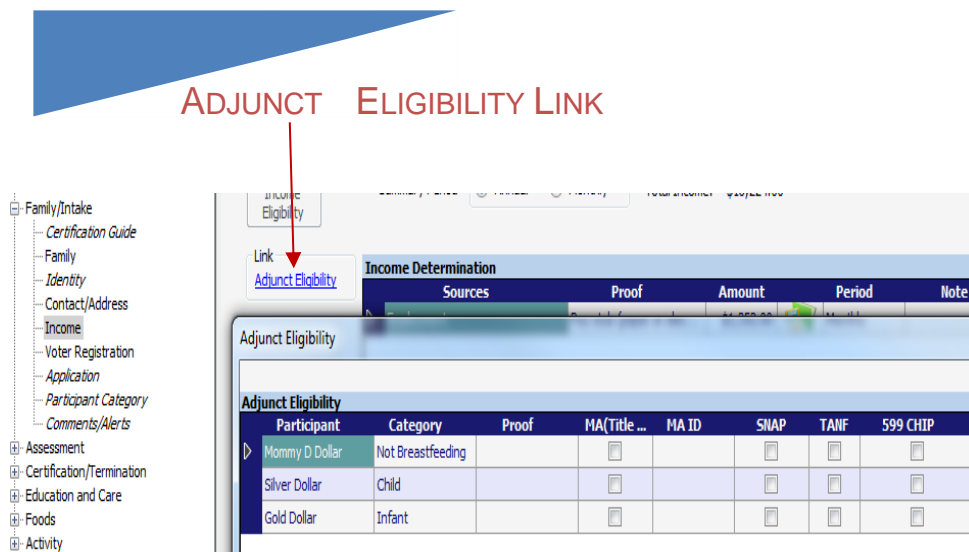
Reassessment of income eligibility is not required at the time the local agency receives information indicating that the participant's income or family size may have changed when this information is received 90 days or less before the end of the certification period.

Documentation of Income in Applicant Record

The income documentation (proof), seen should be entered into Journey using the appropriate choice from the drop down menu.

Documentation of Adjunct Eligibility in Journey

When documenting income information in Journey, the Adjunctive Eligibility link in the Income Panel should be completed first for clients who are participating in a qualified program.



ADJUNCT ELIGIBILITY LINK

Income Determination	
Sources	Proof

Adjunct Eligibility								
Participant	Category	Proof	MA(Title ...)	MA ID	SNAP	TANF	599 CHIP	
Mommy D Dollar	Not Breastfeeding							
Silver Dollar	Child							
Gold Dollar	Infant							

WIC applicant Gold Dollar is receiving Medicaid and staff verified her participation by calling the NEMS line. The adjunct eligibility panel is completed as follows for Gold’s Medicaid participation:



MEDICAID PARTICIPATION DOCUMENTATION

Step 1: Indicate the type of proof seen or used. (for Gold this was the NEMS line)

Step 2: Check the MA(Title...) box and enter Gold’s Medicaid number in the MA ID box. **NOTE: The MA(Title...) box and the Medicaid number must be completed for persons receiving Medicaid to confer adjunct eligibility correctly.**

Documentation of Adjunct Eligibility in Journey (cont)



MEDICAID PARTICIPATION DOCUMENTATION FOR NEW INFANTS

Adjunct Eligibility

Adjunct Eligibility								
Participant	Category	Proof	MA(Title ...	MA ID	SNAP	TANF	599 CHIP	
Gold Dollar	Infant	Medicaid Phone/Computer Verifica...	<input checked="" type="checkbox"/>	123456789	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Mommy Dollar is applying for WIC for Silver Dollar, a week old infant. Mommy does not have a Medicaid number or card for Silver yet.

Because it takes 4-8 weeks to process a new infant for Medicaid WIC uses a place holder when documenting Medicaid participation by newborn infants.

Step 1: Enter Proof used to verify Medicaid participation. For babies less than 8 weeks of age verifying mom’s Medicaid participation confirms the baby’s eligibility for Medicaid.

Step 2: Check the MA(Title...) box to indicate Medicaid participation.

Step 3: Enter 99 in the MA ID field as a placeholder for a Medicaid number. The actual Medicaid number should be entered when it is received by the family.

See the example of a completed Adjunct Eligibility screen for Silver Dollar.



SNAP PARTICIPATION DOCUMENTATION

Adjunct Eligibility

Adjunct Eligibility						
Participant	Category	Proof	MA(Title ...	MA ID	SNAP	
Gold Dollar	Infant		<input type="checkbox"/>		<input type="checkbox"/>	
Silver T Dollar	Infant	Medicaid Phone/...	<input checked="" type="checkbox"/>	99	<input type="checkbox"/>	

WIC applicant Gold Dollar’s family is receiving SNAP benefits, which is one of the eligible adjunct programs. Staff verified the family’s participation for this current month by calling the number on the back of the EBT card. For this instance of SNAP participation the adjunct eligibility panel is completed as follows:

Documentation of Adjunct Eligibility in Journey (cont)

Step 1: Indicate the type of proof seen. (For Gold this was the SNAP phone call)

Step 2: Check the SNAP button. **NOTE: Remember that Nebraska awards SNAP to a family, so if one member of a family is receiving SNAP benefits, the entire family is getting SNAP. Check the SNAP box for each family member. Journey will not automatically check the SNAP boxes for all family members when one box is checked.**

Adjunct Eligibility

Adjunct Eligibility							
Participant	Category	Proof	MA(Title ...)	MA ID	SNAP	TANF	599 CHIP
Gold Dollar	Infant	SNAP Phone/Computer Verification			<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

After completing the information in the adjunct eligibility link the Income panel information should be completed as described in the next section.

Documentation of Income in Journey

Income is documented in Journey using the Income Panel.

To add income for the family, add a row:

Link
[Adjunct Eligibility](#)

Add Row

Income Determination					
Sources	Proof	Amount	Period	Note	

Sources: Identifies the source of the income for the family, (where the income comes from). Examples: employment; verbal given by those who are participating in an adjunct eligible program; tax forms for self-employed or farmers; etc.

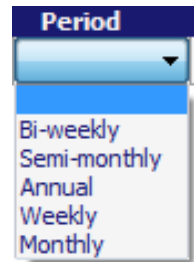
Proof: What proof of the source did you see to document the income? Examples: Those who have a job (source = employment) would show a *paystub*, Those who are participating in an adjunct program (source = verbal estimate of income for adjunct eligibility) would have showed a Medicaid card issued within the last 30 days or staff would have *verified Medicaid* participation using the NEMS line.

Amount: The dollar amount the family receives from that income source. If the amount received is the same every pay period, enter that value in the Amount field. If the amount varies from one time to the next, use the income calculator to enter each amount received during the last month.

Income Determination					
Sources	Proof	Amount	Period	Note	

**Documentation of
Income in Journey
(cont)**

Period: How often payment/benefits are received from this source of income. Examples: weekly, monthly, biweekly, bimonthly, etc.



Note: WIC is required to enter the amount of each pay period within the last month in the note area when the amount paid varies each pay period. EX. Paid weekly: \$225.00; \$200.00; \$221.00; \$186.00

Income Determination					
Sources	Proof	Amount		Period	Note
Employment	Pay stub (paper or elec...	\$208.00		Weekly	\$225.00; \$200.00; \$221.00; \$186.00

You may also indicate who the income is for and other pertinent information. Example: Mom – Dollar General; Dad – Construction Avg 6 months; Mom – Maternity avg. 6 months; Dad – Farmer.

Income Determination					
Sources	Proof	Amount		Period	Note
Employment	Pay stub (paper or elec...	\$125.00		Weekly	Mom - Dollar General
Employment	Pay stub (paper or elec...	\$700.00		Bi-weekly	Dad - Construction Avg 6 month
Tax Forms - Self Employed/Farmer	Tax Forms/1040	\$20,000.00		Annual	Dad - Farmer

**NEBRASKA WIC PROGRAM
INCOME LETTER**

The Nebraska WIC Program requires proof of income in order to provide eligible applicants with program services. This letter allows another person to provide proof of income.

Please complete the following:

Agency/Organization Representative's Name:
(Print)

Agency/Organization:

Address:

Telephone Number:

I verify that _____ is employed by the above listed company/person.

Please complete this section with the amount paid and how often paid.

_____ Amount Paid Hourly Average # of Hours Worked/Week _____
 Weekly
 Bi-Weekly
 Monthly
 Annual
 Other _____

Signature of agency/organization representative

Date

Instructions:

The employer/third party should write:

- His/her identifying information in the spaces provided.
- The name of the person for whom they are providing income information for.
- The amount paid to the employee listed and how often this amount is paid. Examples: hourly wage, salaried wage paid monthly.
- Sign and date the form in the appropriate area.