



FEB -5 1998

**United States
Department of
Agriculture**

Food and
Consumer
Service

3101 Park
Center Drive

Alexandria, VA
22302-1500

SUBJECT: WIC Policy Memorandum: #98-4
Documentation of Food Stamp Program Participation in
an Electronic Benefits Transfer (EBT) Environment

TO: Regional Directors
Supplemental Food Programs
All Regions

This policy memorandum provides guidance on acceptable forms of documentation which confirm current participation in the Food Stamp Program (FSP) for WIC adjunctive income eligibility purposes.

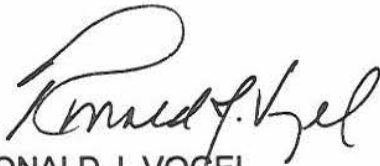
As you may know, the FSP is under a mandate by Congress to convert all benefit delivery to EBT by the year 2002. Many States have already done so, eliminating the traditional FSP card, and issuing a plastic card, usually with no name and no eligibility date printed on it. This can present a dilemma for the WIC Program because local agencies are accustomed to seeing certain paper documentation as proof of FSP participation in determining adjunctive income eligibility for WIC. Section 246.7(d)(vi)(A)(1) of the WIC regulations requires that applicants document their participation in the Food Stamp, Medicaid or Temporary Assistance for Needy Families (TANF) Program in order to be deemed adjunctive income eligible. Self declaration of participation in one or more of these programs is not acceptable documentation.

The increasing use of EBT by States to provide FSP benefits as well as other program benefits such as TANF, has raised questions concerning the appropriateness of an EBT card as proof of adjunctive income eligibility, since an individual's current participation in the FSP cannot be determined by visual examination of the EBT card. Therefore, WIC clinic staff shall not accept an EBT card as proof of current FSP or other adjunctive program participation, unless the card contains the period of eligibility. However, by regulation, the FSP still issues a paper notification of eligibility, which includes the certification period. This paper notification, as well as on-line access data systems that are available to WIC clinic staff are acceptable forms of documentation of FSP participation. WIC clinic staff must record in the participant's case file the type of documentation that was used to document participation.

WIC State agencies should provide policy information to their local agencies about the new card and notice prior to FSP conversion to EBT, to ensure that no WIC applicant is rejected due to lack of appropriate documentation. WIC clinic staff should instruct applicants to bring appropriate documentation to their certification appointment so applicants are enrolled expeditiously when there is no on-line mechanism to verify current FSP participation.

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It is in WIC's best interest to meet early with State FSP project planners to advise them about the need for documentation to facilitate verification of FSP eligibility. It would certainly be advantageous for WIC if the FSP would agree to inform their clients of the paperwork requirements for WIC adjunctive eligibility purposes. As an extra measure to ensure this communication occurs, we suggest that WIC State agencies make fact sheets available to the FSP explaining the paperwork required to document current FSP participation in an EBT environment. The fact sheets could be easily distributed in FSP offices (as well as any other programs which issue benefits via an EBT card) making the information readily available to potential WIC applicants.



RONALD J. VOGEL
Acting Director
Supplemental Food Programs Division