Effective Date: 10/13/2023

2.0 Eligibility/Certification

2.03 Identity

**PURPOSE:** To ensure applicants/client provide acceptable proof of identification for certification.

#### A. POLICY

- Proof of identity is required for initial certification and each subsequent certification of each applicant/client and authorized person or proxy, if applicable. (See Policy 8.03, Proxy Policy.)
- 2. Local agencies must verify identity of each client/authorized person transferring from an out of state or WIC Overseas Program. (See Policy, 3.04 Transfers.)
- 3. Acceptable forms of proof of identification may be provided in paper or electronic format, such as via phone, tablet, email, or other electronic source. Electronic documentation may be provided/shown in person or sent to the clinic via secured electronic means. This documentation can be received at any point during the certification process, from the date of application until the certification is complete. (See Policy 3.01, Processing Timeframes and Appointment Scheduling.) Examples include:
  - a. Immunization Record
  - b. Birth Certificate
  - c. Hospital Record/Crib Card
  - d. Health Insurance Identification
  - e. Social Security Card
  - f. Photo Identification
  - g. Driver's License
  - h. Student Identification Card
  - i. State Identification Card
  - j. Work Identification Card
  - k. Pay Stubs
  - I. Voter Registration
  - m. Other DHHS Program Identification (i.e., MiHealth or SNAP)
  - n. Michigan WIC EBT Card
  - o. WIC/WIC Overseas records from other states/jurisdictions
  - p. Other records that the WIC State Agency considers adequate to verify identity (passport, immigration papers, etc.)

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Note: One type of documentation may serve as proof for multiple certification documentation requirements (i.e., a State Identification card may be used as proof for both residency and identity).

- 4. Staff who confirm identity must document the type of proof provided.
- 5. An applicant/client who possesses proof of identity but did not bring it to the certification appointment may be eligible for a short certification. (See Policy 2.17, Certification Periods.)
- 6. An applicant/client who does not possess proof of identity must be fully certified with the completion of an attestation form. This includes, but is not limited to:
  - a. A victim of theft, loss, or disaster.
  - b. A person experiencing homelessness.
  - c. A migrant.
- 7. Applicants/clients who do not possess/provide proof of identity during the initial certification must provide proof at the subsequent certification.
- 8. Visual personal recognition by WIC staff at issuance of benefits or subsequent certifications is allowed once initial proof of identity has been established. If acceptable photo identification has been retained on file as proof of identity from a prior certification, that proof may be used to establish identity at a subsequent certification (i.e., proofs required to be scanned during a single certification). (See Policy 9.03, Employee Conflict of Interest and Separation of Duties.)
- 9. State agencies must take steps to ensure that confidentiality standards are adhered to and appropriate security measures are adopted.

### B. GUIDANCE

1. If the State or local agency has reason to believe information received is questionable, WIC clinic staff shall take steps to verify the information presented.

### Reference:

7 CFR 246.7(c)

USDA WIC Policy Memorandum #99-4 March 11, 1999: Strengthening Integrity in the WIC Certification Process

USDA WIC Certification and Eligibility Resource and Best Practices Guide, June 2021 USDA WIC Policy Memorandum #2023-6 May 10, 2023: Streamlining Certification – Documentation Guidance

## **Cross Reference:**

- 2.17 Certification Periods
- 3.01 Processing Timeframes and Appointment Scheduling
- 3.04 Transfers
- 8.03 Proxy Policy
- 9.03 Employee Conflict of Interest and Separation of Duties