

Section 8: Certification, Eligibility & Coordination

Subject: FY18 CO WIC Policy Letter #3 Adjunctive Eligibility: Medicaid Update

New Policy: Health First Colorado Limited (Emergency Medicaid Program), Transitional Medicaid and any other type of Medicaid is acceptable documentation for adjunctive eligibility/proof of income.

Update to FY18 Program Manual:

Adjunctive Eligibility

WIC accepts current participation in **Health First Colorado (Colorado Medicaid) or any of Colorado's other Medicaid Programs (e.g. Health First Colorado Limited/Emergency Medicaid, Transitional Medicaid, etc.)**, Temporary Assistance to Needy Families (TANF - referred to as Colorado Works Program), or the Supplemental Nutrition Assistance Program (SNAP) as evidence of financial eligibility for participation in WIC. USDA refers to this as adjunctive eligibility. Persons who are currently participating in these programs have already had their income screened by these programs and are automatically income eligible for WIC.

It is possible that the household income of persons who are adjunctively income eligible exceeds the *WIC Income Eligibility Guidelines*. In this instance, adjunctive eligibility takes precedence. Completion of the Adjunct Eligibility field overrides any amounts entered in the Income Determination field and allows the certification to continue. By completing the Adjunct Eligibility field in Compass, the WIC user verifies they witnessed proof of current enrollment in **Health First Colorado/Medicaid***, SNAP or TANF during the certification/recertification visit.

*** Colorado Medicaid Programs (Regular, Emergency, Transitional Medicaid Program, etc.) will be referred to as Health First Colorado/Medicaid within the policy.**

For participants who present a Health First Colorado/Medicaid card or who claim to participate in any Health First Colorado/Medicaid program:

- Verify the participant is an active **Health First Colorado/Medicaid** participant. If verified, enter the **Health First Colorado/Medicaid** information into the Adjunct Eligibility field, and enter the Health First Colorado number in the 'MA ID' field.
- The participant must also verbally declare their household's gross income and staff enters that amount into the Income Determination field with Verbal as the Source and Medicaid/SNAP/TANF as the Proof. Once the participant is determined to be active on **Health First Colorado/Medicaid**, SNAP, or TANF, no other proof of income is required.
- In the instance where a child presents an active Colorado Health First Colorado card as proof of income and other family members are categorically eligible, complete the Adjunct Eligibility link for the child with Health First Colorado and leave the Income Determination box blank. Next certify the child and provisionally certify the remaining participants in the household. Upon return next month, proof of household income must be presented in order to certify the remaining household members and the WIC user must enter the income amount into the Income Determination field in the Income panel.

- At this appointment, if **Health First Colorado/Medicaid** cannot be verified and all proofs of income are not available, the participant must return within 30 days with acceptable proof/s of income.
- If adjunctive eligibility is used to financially qualify a participant, monthly gross income, the economic unit size, and proof of income must be recorded on the Income panel. (Note: Compass will block Certification/Recertification of any participant when household income entered in the Income Determination field exceeds the current IEGs unless Medicaid, SNAP, or TANF information is entered in the Adjunct Eligibility hyperlink.
- A mother or infant's **Health First Colorado/Medicaid**, SNAP, or TANF participation income-qualifies any categorically eligible family member. Additionally, due to the Needy Newborn Health First Colorado Coverage legislation, when a newborn's mother has Health First Colorado benefits, that infant is automatically eligible to receive Health First Colorado until one year of age. If the newborn's WIC certification occurs prior to the infant being assigned a Health First Colorado number, enter "Pending" for the infant in the MA ID field in Compass.
- Adjunctive income eligible WIC participants receive benefits for a full certification unless the endorser/participant reports that they no longer receive **Health First Colorado/Medicaid**, TANF, or SNAP during the certification period.
- When participants report that they are no longer receiving **Health First Colorado/Medicaid**, TANF, or SNAP: When 90 days or less remains in the certification period, the remainder of the household's food benefits may remain active through the current certification period. When the remaining certification period is longer than 90 days, redetermine income eligibility. If over income, issue 15 days of benefits (from the date of disqualification) and give a *Notification of Ineligibility, Termination, or Denial of Services* to the disqualified participant. If the participant's food benefits extend beyond 15 days from the date of disqualification, no additional food issuance is required. Other family members participating in the WIC Program based on this participant's adjunctive eligibility must also be rescreened for income eligibility.

For participants who present a Supplemental Nutrition Assistance Program (SNAP) Eligibility Notice or TANF Eligibility Notice:

- The WIC certification/recertification date must be within the valid dates listed on the SNAP or TANF Eligibility Notice.
- The participant must verbally declare their gross income. Enter the amount in Compass in the Income Determination Field with Verbal as the Source and Medicaid/SNAP/TANF as the Proof.
- SNAP must be checked in the Adjunct Eligibility field.

In some cases, if one member of a household is receiving **Health First Colorado/Medicaid**, TANF, or SNAP benefits, adjunctive income eligibility may then apply to other members of the household.

- If the household has SNAP benefits, all members of the household have WIC adjunctive income eligibility.
- If a pregnant woman has **Health First Colorado/Medicaid**, all members of her household qualify for adjunctive eligibility (verification that the participant is active on **Health First Colorado/Medicaid** is required)
- If an infant has a **Health First Colorado/Medicaid** card, all members of his/her household have adjunctive income eligibility.
- If one member of the household receives TANF benefits, all members of the household have adjunctive income eligibility.

A participant may self-declare adjunctive eligibility for a 30-day period if they have failed to bring documentation to a certification/recertification visit. Presumptive eligibility with any of the above programs does NOT adjunctively qualify an individual for WIC because income documentation is not required at presumptive eligibility enrollment.

Adjunctive income eligibility does not apply to other household members when:

- A child has **Health First Colorado/Medicaid**.
- A foster child (even if an infant) has Health First Colorado. A foster child can never confer adjunctive income eligibility to other household members since WIC considers the foster child a one-person household.
- A postpartum woman has **Health First Colorado/Medicaid**.