

WIC Income Tab Data Report

Background:

There's a lot of attention at the federal level on WIC's income eligibility determination procedures.

In 2013, the Government Accounting Office (GAO) published their report "WIC Program: Improved Oversight of Income Eligibility Determination Needed."

In response to the issues the GAO found FNS published a memo with updated income assessment procedures.

Washington WIC is having a Management Evaluation (ME) in early 2016.

- FNS staff will visit Washington and review policy and procedures for certification.
- They will also visit clinics to observe certification practices.

We requested data from the Income Documentation tab in Client Services to:

- See how staff are documenting income information in Washington.
- Inform policy revisions.
- Identify training needs.

We looked at the Income tab data for all participating (not enrolled) clients for March 2015. The total participating caseload for March 2015 was 163,052.

Results:

Staff are doing a great job!

- There were few errors.
- The magnitude of the errors was small.
- There are some limitations in the data – the numbers don't always tell the whole story.

Household size:

- Most households have 4 people. (This was the mean, median and mode).
 - Workload could potentially decrease with the Cascades system group based income screen.
- Most clients with a household size of 1 were either children or infants (2.4%, n = 3,879)
 - The majority of these households had foster care as the source of income (1.3%, n=2,079).
 - Mark each foster child as a household of 1, with foster care as the source of income.
- Interestingly, a small number of breastfeeding women had a household size of 1 marked (0.1%, n=134).

Income Source:

- The most common primary source of income was employment (70.5%, n=115,187).
- Large majority of clients (77.1%, n=125,772) have some income from employment.

Adjunctive Eligibility and Income:

- Adjunctive eligibility programs:
 - Medicaid Title 19 and state/federal non-Title 19: 62.3 %, n=101,653
 - TANF: 0.5 %, n=891
 - SNAP: 1.6 %, n=2,538
 - FDPIR: < 0.1 %, n=11
 - Adjunctive eligibility due to a household member: 1.6%, n=2,493
- The majority of clients had some form of adjunctive eligibility, either through themselves or through a household member (66.1%, n=107,586).
 - 64.5% had adjunctive eligibility for themselves (use the box at the top of the screen)
 - 1.6 % had adjunctive eligibility due to a household member (use the Adj Elig pop-up)
- The majority of those using ProviderOne for adjunctive eligibility had a P1 number documented in CIMS.
 - A small percent (3.0%, n=4,835) did not have a number documented in the P1 field.
 - We know that some of these clients probably have the P1 number documented in the Income comments field.
- There are 4,072 clients (0.1%) who have Medicaid adjunctive eligibility listed for themselves (Medicaid box at the top of the screen marked), no P1 number listed, and have an income amount documented that is over WIC's guidelines.
 - Be sure to enter the P1 number, search and get a positive result before marking the box.
- One unexpected finding was the large number of people without adjunctive eligibility who had a P1 number (22.1%, n=35,984).
 - This happens when staff search the P1 number and don't find adjunctive eligibility. CIMS saves the most recent P1 number searched.
- 5,372 (3.6 %) participants with adjunctive eligibility documented had an income over WIC guidelines. This is consistent with national estimates (2-9%) since the Medicaid Expansion in 2014.

Zero Income:

- The number of clients with zero income documented in Washington (3.9%, n= 6,415) is much higher than the national prevalence (0.8%).
 - When out-of-state transfers (n=1684) were removed (they default to zero income), the total Washington WIC percent with zero income was 2.7%.

Proof of Identity:

- Top 3 types of ID selected:
 - P1 card (68.8 %, n=112,179)
 - WIC Appointment/ID Folder (6.1%, n=9,957)
 - Driver's license (5%, n=8,236)
- Very low rates of missing proof of ID:
 - "Not Provided" (grace period) proof of ID = 0.3% (n=488).
 - The No Proof of ID/Residency form is used very little (0.1%, n=133).
- A small number had proof of ID that doesn't fit with the client category (1.7%, n=2,637).
 - For example, some children had these items selected for ID: driver's license, Voter Registration Card and Work or school ID.

Proof of Income:

- A large prevalence (17.5%, n=28,565) of people without adjunctive eligibility marked had the Medical Card/ProviderOne selected as proof of income.
- Less common (5.2%, n=8,526) was someone having adjunctive eligibility through Medicaid or another program marked, but a non-adjunctive form of proof (paycheck, divorce decree, etc.).
 - Clinic staff may be documenting proof of actual income when the client brings it to the clinic and the client has adjunctive eligibility.
 - We're changing policy to specify that staff must document the proof of adjunctive eligibility as the client's proof of income.
- Low rates of missing proof of income:
 - "Not Provided" (grace period) for proof of income 0.7% (n=1,133).
 - The WIC Statement of Income Form was used for 0.9% (n=1,511) of clients.

Income Averaging and Income Interval

- GAO recommended more consistency for the definition of "current" month.
 - FNS is requiring all WIC programs to define current month as the past 30 days.
 - We'll make the change with policy chapter late this year.
- The most common income interval was monthly (62.8%, n=102,317).
- Income averaging is rare, occurring only 0.1% (n=199) of the time.
 - Don't forget about the option to use annual income (income average) for fluctuation income, a lump sum, or a recent raise that puts the person over income.
- There were some clients (0.2%, n=384) we believe had an incorrect income interval selected.
 - For example some clients have a large amount listed for a particular interval (for example \$300 with hourly or \$8,000 bi-weekly).

Residency:

- Top 3 types of proof of residency:
 - Proof of residency used most often is the ProviderOne card (77.0%, n=125,599).
 - This is higher than the 66% of clients with adjunctive eligibility since staff can use the positive search result as proof of residency for the entire household.
 - WA state driver's license = 7.7% (n=12,570).
 - Utility bill with physical address 4.8% (n=7,765).
- Low rates of no proof of residency:
 - "Not Provided" (grace period) for proof of residency = 0.4% (n=668).
 - The No Proof of Residency/ID form is used rarely (0.2%, n=272).

Next Steps

We used the information from the GAO report, the FNS memo and the Income Tab data report to:

1. Revise policy
 - We sent the Income policy chapter to FNS for approval.
 - Look for the chapter later this year or early 2016.
2. Develop training materials
 - We plan to create short, topic specific training materials for staff.
 - We'll update staff tools to align with the policy changes.

In the meantime, keep doing the great work that you do every day!

Review the revised policies and training materials when published.

Contact information:

Call the state office with your questions:

- LATA: 1-800-841-1410, press 0 and ask for LATA.
- CIMS Support: 1-800-841-1410, press 7.
- Marian Polsak: 1-800-841-1410, ext. 3689

For persons with disabilities, this document is available on request in other formats.

To submit a request, please call 1-800-841-1410 (TDD/TTY 1-800-833-6388).

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