

# Chapter 6A Certification/Participation - Application Process

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This chapter describes policies and procedures related to the process of applying for WIC Program benefits including eligibility requirements, processing standards, requirements for physical presence and proof of identity and residence, requirements of the National Voter Registration Act, and the certification schedule.

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**Required Local Agency Written Policies and Procedures**

- Local agencies must have a written policy for handling applications within processing standards when specific appointments are not given such as in open access scheduling or when walk-ins are allowed. (Section 2, page 4)
- Local agencies must have a written policy that identifies the staff position and alternate staff position responsible for the management of “NVRA Agency Transmittal Forms” and retention of the “Board of Elections Voter Registration Preference Forms”

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## Eligibility Criteria

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An individual must fulfill four requirements to be eligible to participate in the North Carolina WIC program. Eligibility must be determined at each certification and subsequent certification. Refer to Section 9 for information on the WIC recertification schedule.

### ■ **Categorical Eligibility**

An individual must belong to one of the following categories of people:

- ▶ **Pregnant Women** (proof of pregnancy is not required)
- ▶ **Postpartum Breastfeeding Women up to one year postpartum** A woman is considered to be breastfeeding if she either feeds breastmilk to her infant/s at least once every 24 hours on average; or expresses milk with the intention to breastfeed at least once every 24 hours on average.

A non-birth woman who breastfeeds a WIC infant is eligible for up to the infant's first birthday. A non-birth breastfeeding woman must be an adoptive mother of the WIC infant and/or living in the same household as the WIC infant that is receiving her breastmilk and she must meet all of the eligibility requirements of residency, income, and nutrition risk.

- ▶ **Postpartum Non-Breastfeeding Women up to 6 months postpartum.** A woman who has been pregnant within the past 6 months, is categorically eligible to participate in WIC regardless of the length of the pregnancy or its outcome (i.e. stillbirth, miscarriage or spontaneous/elective abortion).
- ▶ **Infants (birth to 12 months of age)**
- ▶ **Children (12 months of age up to their fifth birthday)**

### ■ **Residential Eligibility**

An individual must reside within the State of North Carolina. Length of residency within North Carolina is not a requirement for eligibility for WIC. Refer to Section 5 of this chapter for additional guidance on residential eligibility.

### ■ **Income Eligibility**

An individual must provide documentation of adjunctive eligibility or a gross household income at or below 185% of the current federal poverty income guidelines. Refer to Chapter 6B for additional guidance on income eligibility.

### ■ **Nutrition Risk Eligibility**

An individual must be at nutrition risk, as determined by a competent professional authority using North Carolina's nutrition risk criteria. Refer to Chapter 6C for additional guidance on completing a nutrition assessment and determining nutrition risk eligibility.

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## Application Process

Local agencies must accept applications whenever the agency is open. An application for WIC Program benefits must be started whenever an individual/parent/guardian/caretaker contacts (by phone or in-person) the local agency and asks for WIC services. The application process must be provided at no cost to the applicant.

Local agencies must address the needs of *all* applicants but are required to make program services more accessible for applicants who live in rural areas, have transportation problems, and/or are employed or attend school. Time specific appointments should be made available to individuals who are in school or who work to minimize time spent away from work and school. Refer to Chapter 10 for additional information about program access.

### ■ Processing Standards

Local agencies must inform applicants whether they are eligible (or ineligible) for the WIC Program within specified time frames. These time frames are called “Application Processing Standards” and they become effective whenever an individual contacts the local agency and asks for WIC services. The time intervals shown below must be used to meet processing standards.

| <b>WIC Program Processing Standards</b>   |   |
|---|---|
| <b>Type of applicant</b>  | <b>Time interval by which applicant must be notified of eligibility/ineligibility</b> |
| <ul style="list-style-type: none"> <li>▪ Pregnant women eligible as Priority I participants</li> <li>▪ Infants younger than six months</li> <li>▪ Migrant farmworkers* and their family members who soon plan to leave the agency's service area</li> <li>▪ Homeless individuals**</li> </ul> | 10 calendar days from contact   |
| <ul style="list-style-type: none"> <li>▪ All other applicants</li> </ul>  | 20 calendar days from contact   |

\* **Migrant Farmworkers.** Migrant farmworkers and their family members are defined by federal regulation as individuals whose principal employment (over 50 percent) is in agriculture on a seasonal basis, who have been so employed within the last 24 months, and who establish a temporary residence for the purpose of such employment.

\*\***Homeless Individuals.** Homeless individuals are defined by federal regulations as individuals who lack a fixed and regular nighttime residence, or who have a primary nighttime residence that is a public or private shelter, including a welfare hotel, a congregate shelter, a shelter for domestic violence designated to provide temporary living accommodation; an institution that provides temporary residence for individuals intended to be institutionalized; a temporary accommodation of not more than 365 days in the residence of another individual; or a public or private place not designated for, or ordinarily used as, a regular accommodation for human beings.

■ **Requests About Applying For WIC**

When someone contacts the local agency either in person or by phone and asks for WIC services, staff should take the following actions:

- ▶ **Do a State-wide search for a pre-existing Crossroads record or establish a new Crossroads record for the family for whom the caller is inquiring.**
- ▶ **Explain eligibility requirements.** Staff should explain categorical, income, residential, and nutrition eligibility requirements and the types of documents that will be needed to complete the eligibility determination, including proof of identity, proof of residence, and proof of income. It should be made clear to the caller that they must visit the WIC office in person to apply for and to have their eligibility for WIC determined.
- ▶ **Schedule a WIC certification appointment within processing standards.** When an applicant contacts the local WIC office by phone or comes in and asks for WIC services, the applicant must be given an appointment within processing standards. If the appointment is outside of processing standards for the applicant's category, staff must document the reason that causes the appointment to be outside of the applicable processing standard. Acceptable reasons include:
  - the applicant prefers an appointment outside of the applicable processing standard
  - the applicant wishes to coordinate the appointment with another family member that causes the appointment to be outside of the applicable processing standard.
- ▶ **If the applicant requests an appointment outside of processing standards**  
The report "Detail Initial Certification Appointments Made Outside of Processing Standards" can be used to identify trends and details of appointments made outside of processing standards.

When the local WIC Program does not routinely give specific appointment times, such as in open access scheduling systems or when walk-ins are allowed, a written policy must be in place detailing how applications will be handled within processing standards.

- ▶ **Follow-up.** Local agencies can use the Crossroads "Daily Appointments to be Rescheduled Detail" report to identify and follow-up with pregnant women who do not keep their appointment for WIC eligibility determination to complete the required follow-up within ten days of the date of the missed appointment. Local agencies should follow up with other applicants who miss their appointment to determine eligibility within twenty days of the date of the missed appointment. This is a best practice to help maintain and build caseload.

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## Physical Presence

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All applicants/participants must be physically present at the initial certification and at each subsequent certification, and their presence must be documented.

### ■ Documentation of Physical Presence

Staff must document whether or not the individual is physically present on the Participant Demographics screen in Crossroads.

When the applicant/participant is not physically present and the reason for his/her absence meets one of the allowable exceptions; staff must make a selection from the Physical Presence Exception Reason drop down and complete the eligibility determination.

When the applicant is not physically present and the reason for his/her absence does not meet one of the allowable exceptions, the eligibility determination must be deferred but completed within processing standards (refer to Section 2 for information on processing standards).

### ■ Exceptions to the Requirement for Physical Presence at Certification

Allowable exceptions to the physical presence requirement are limited to the following situations and must be evaluated for each individual at each certification.

- ▶ **An applicant/participant or parent/guardian/caretaker with a current medical condition** which can be self-reported by the applicant/participant/guardian/caretaker, or documented by a physician or other health care provider in the applicant's/participant's health record, or provided through a medical referral form. **The conditions are limited to:**
  - a medical condition that necessitates the use of medical equipment that is not easily transportable;
  - a contagious illness that may be communicated to others by coming to the agency;
  - a serious illness that may be compromised by coming to the local agency, or a medical condition that requires confinement to bed rest;
  - a fragile premature infant who may be compromised by coming to the local agency.
  
- ▶ **An Infant Under Eight Weeks of Age** who cannot be present at certification may be exempt from the physical presence requirement for a reason determined to be appropriate by the local agency. All necessary information that pertains to ongoing healthcare to complete the certification must be provided by the parent/guardian/caretaker.

- ▶ **An Infant or Child Receiving Documented Ongoing Health Care** from any health care provider, including the local agency, may be exempt from the physical presence requirement when being physically present would pose an unreasonable barrier to participation. This exemption may be used if the infant or child was present at his/her initial certification.
  
- ▶ **An Infant or Child Whose Parent(s)' Working Status Presents a Barrier**  
An infant or child who is under the care of one parent who works, or is under the care of two parents who both work, may be exempt from the physical presence requirement when the work schedule of the parent(s) presents a barrier to bringing the infant or child to the WIC clinic. This exemption may be used if the infant or child was present at his/her initial certification *and* was present at his/her certification/subsequent certification within the past twelve months, and this certification period has not expired.



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## Proof of Identity

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At each certification appointment, proof of identity must be provided by the applicant/participant or by the parent/guardian/caretaker if the applicant/participant is an infant or child.

■ **Acceptable Proof of Identity**

Refer to Attachment 1 for documents that can be used by the applicants/participants to establish proof of identity.

■ **Documentation of Proof of Identity**

Local agency staff must review at least one current form of identification (ID) for each applicant/participant and document the type of identification reviewed in the Crossroads system. It is NOT necessary or required to scan a copy of the proof used to confirm identity.

■ **Individual Lacks Proof of Identity**

▸ **Failure to bring existing proof of identity**

- At a certification appointment when an individual has proof of identity but fails or forgets to bring the proof, the determination of eligibility must be deferred but completed within processing standards (refer to Section 2 for information on processing standards).
- At a subsequent certification appointment eligibility determination cannot be completed until proof of identity is provided. Inform the participant of the needed documentation and complete the eligibility determination at a subsequent visit as per local agency policy. Once the application for subsequent certification is begun in Crossroads the participant's record status moves to applicant. No further issuance would be allowed until the subsequent certification is completed.

▸ **Proof of identity does not exist** “The Affidavit for Identity” must be printed, completed, signed and scanned into the Crossroads system. Legitimate situations may exist when an individual is unable to provide proof of identity. These include when an individual:

- is a victim of theft, loss, or disaster,
- is homeless,
- is a migrant farm worker, and/or
- has had to flee from a high risk situation (i.e. battered women/children, evacuee, or refugee) and subsequently left behind all identification.

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## Proof Of Residence

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At each certification appointment, proof of the place of residence (where the applicant routinely lives or spends the night) must be provided by the applicant/participant or by the parent/caretaker if the applicant/participant is an infant/child. The physical address must be a North Carolina residence. There is no requirement on the length of time an applicant must reside at the location or address before applying for WIC.

### ■ **Acceptable Proof Of Residence**

Refer to Attachment 1 for documents that can be used by applicants/participants to establish proof of residency.

Any item used for proof must show a current physical address. When the applicant/participant only has items listing a post office box, staff must document the physical address as well as the mailing address in the Crossroads system.

The proof of residence provided may be in the name of a family household member other than the applicant/participant. The document can serve as proof of residence for each applicant/participant in the family household.

### ■ **Documentation Of Proof Of Residence**

Local agency staff must review at least one proof of residence for each applicant/participant. Staff must document the type of proof of residence in the Crossroads system. It is NOT necessary or required to scan a copy of the proof used to confirm residency.

### ■ **Individual Lacks Proof Of Residence**

#### ▸ **Failure to bring existing proof of residence.**

- At an initial certification appointment when an individual has proof of residence but fails to bring the proof to the certification appointment, the determination of eligibility must be deferred but completed within processing standards unless the applicant prefers to return outside of processing standards.
- At a subsequent certification appointment, eligibility determination cannot be completed until proof of residence is provided. Inform the participant of the needed documentation and complete the eligibility determination at a subsequent visit as per local agency policy. Once the application for subsequent certification is begun in Crossroads the participant's record status moves to applicant. No further issuance would be allowed until the subsequent certification is completed.

#### ▸ **Proof of residence does not exist.** When an individual is unable to provide proof of residence, the reason for lack of proof must be documented in the Crossroads system. The Affidavit for Residency must be printed, completed, signed and scanned into the Crossroads system.

Legitimate situations where proof of residence may be lacking include when an individual:

- has moved recently and his/her current address is not yet on any documents;
- is a victim of theft, loss, or disaster;
- is homeless;
- is living in a shelter or institution. (Refer to Chapter 6E for information on WIC Program requirements related to institutions and homeless facilities.)
- is a migrant farm worker; and/or
- has had to flee from a high risk situation (i.e. battered women/children or refugee) and subsequently left behind all proof of residence.

Staff should use professional judgment in a consistent manner when evaluating the merit of other situations that may be presented as a reason for lacking proof of residence.

■ **When Place of Residence Must Be Kept Confidential**

- It is essential to maintain confidentiality of residency for applicants/participants who are living in a shelter or residential facility for battered women and/or children. The physical address is a required field on the Family Demographics screen in Crossroads system. The local agency may choose to use either the agency address, “Confidential” or “See Affidavit” as the entry in this section as a means to protect the at risk woman or family. Proof Provided by Affidavit should be selected as proof of residence. Staff should print, complete, sign and scan the Affidavit of Residency into the Crossroads system.

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## Representatives for Infants/Children at Certification

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Infants and children should be accompanied by their parent/guardian/caretaker at each certification.

### ■ Parents

Parents, natural or by marriage (step-mother or father), can serve as the infant/child's representative when applying for WIC benefits.

### ■ Guardians

Foster parents and other court appointed guardians can serve as the infant/child's representative when applying for WIC benefits.

A child is considered a family unit of one if he/she is living in foster care designated by the local Department of Social Services (DSS) or is living in a private/public child placement agency licensed by the State of North Carolina/DHHS/DSS. The foster parent must provide proof of identity and residency for the infant/child in foster care.

### ■ Caretakers

A caretaker may be an extended family member such as a grandparent, aunt, uncle, or other family member 18 years of age or older. A caretaker may also be a neighbor or friend in whose care the child is routinely placed.

When an infant/child is left in the care of an adult for reasons such as child abandonment, incarceration of the parent, or death of the parent, the adult may be considered a caretaker. The circumstance that requires the use of an emergency caretaker must be documented in the infant/child's Crossroads record. The emergency caretaker can serve in the place of the absent parent as the infant/child's representative when applying for WIC benefits. Once the requirements for certification are met, staff should issue food benefits for an appropriate time based on the nutrition care plan and schedule the next appointment.

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## National Voter Registration Act (NVRA)

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The National Voter Registration Act (NVRA) of 1993 requires a number of benefit programs, including the WIC Program, to offer program applicants/participants/parents/guardians/caretakers the opportunity to register to vote.

In North Carolina, there is a Cooperative Agreement between the Division of Public Health and the State Board of Elections to describe the responsibilities of both groups to coordinate and ensure the effective implementation of the NVRA.

For the WIC Program, the requirements of the NVRA are effective whenever an individual applies for WIC Program services, is subsequently certified for Program services, or notifies staff of a change in address or name. For infants/children, the NVRA requirements apply to their parents/guardians/caretakers.

### ■ Requirements of the NVRA for WIC Programs

At the time of application for program benefits, subsequent certification, or a change in residential address or name, local agency WIC staff must:

- offer the opportunity to register by asking the following question using the exact wording stated: “If you are not registered to vote where you live now, would you like to apply to register to vote here today?”
- the above question must be asked to all applicants/participants/parents/guardians/caretakers 18 years or older or be at least 16 years old with (the understanding that the individual must be at least 18 years old on election day of the general election to vote) or to update their address or name information with the local Board of Elections.

**Note:** *The voter registration area in Crossroads will not be active for anyone under 18 years of age at the time of the visit. Local agency support staff must remember to ask the question of participants/parent or guardians who are 16 or older and proceed with providing voter registration materials and assistance in completing the forms as needed.*

- make it clear that the applicant/participant/parent/guardian/caretaker’s decision to accept or decline the opportunity to register to vote will in no way affect any decision regarding their eligibility for the WIC Program.
- have applicants/participants/parents/guardians/caretakers complete and sign a Voter Registration Preference Form (available in English and Spanish), by checking one of the boxes as appropriate, to document that they have been offered the opportunity to register to vote. If an individual decline to sign, the individual will be considered to have decided not to register to vote at this time.
- document the response to the voter registration question by selecting the applicable dropdown box option that is provided in the Crossroads system.

- offer the NC Voter Registration Application (available in English and Spanish) to all applicants/participants/parents/guardians/caretakers and offer assistance in completing the application upon request.
- **Note:** *LA staff must offer the NC Voter Registration Application to all eligible individuals even if they say they do not want to register to vote at this time or they are currently registered to vote.*
- review the submitted NC Voter Registration Application immediately when they elect to complete the application in the office. Local Agency staff must have the individual complete any missing information before the individual leaves the local agency.
- maintain a copy of the original Voter Registration Preference Form in a confidential manner on site for a period of four years. Forms must be available for review upon request.

*Note: WIC confidentiality requirements do not allow the release of WIC applicant/ participant information beyond the completed NC Voter Registration Application to parties outside the WIC Program.*

#### ■ **Required NVRA Forms – North Carolina State Board of Elections**

There are three required forms the NC WIC Program must utilize to implement the WIC Program NVRA policy, the forms are listed below:

1. NC Voter Registration Application (Version 09 2016)
2. Voter Registration Preference Form (August 2013)
3. NVRA Agency Transmittal Form (January 2017)

#### **NC Voter Registration Application**

All local agencies must maintain a supply of Voter Registration Applications on site to website to <https://www.ncsbe.gov/Voter-Information/VR-Form> implement the requirements of the NVRA. This form is available by ordering from the State Board of Election (SBOE) Voter Registration Application Forms are numbered, and local agencies should not photocopy blank form for convenience.

#### **Voter Registration Preference Form**

Registration Preference Forms may be ordered directly from Nutrition Service Branch (NSB) using the NSB Requisition Form.

#### **NVRA Agency Transmittal Form**

The NVRA Agency Transmittal form is a summary of completed Voter Registration Applications. The preference form count is also included on the transmittal form.

- The completed packet along with the transmittal form is submitted by designated local agency staff to their county Board of Elections office by the delivery method options listed on the form: In person, By mail, Courier or County mail.
- In the event an agency has no NC Voter Registration Applications to submit, the NVRA Transmittal Form must be completed with the preference form count included. This



completed form must be submitted within 5 business days of obtaining Preference forms. The completed form may be emailed to the local Board of Elections (BOE), after confirmation with the local BOE that this is acceptable.

- NVRA Transmittal Forms are specifically customized for local WIC agencies and are available for order on the NSB Materials Requisition Form or for download forms at the NSB website:  
<http://www.nutritionnc.com/wic/laResources/AgencyTransmittalForm070317.pdf>
- Forms must be available for review upon request

**Note:** *The completed NVRA Agency Transmittal Form and completed Voter Registration Applications must be submitted to the county BOE by local agency designated staff within five business days. Local agency designated staff must maintain a copy of the original Voter Registration Preference Form and the NVRA Transmittal Form in a confidential manner on site for a period of four years.*

■ **Local Agency Protocol**

Each local agency must have a written policy that identifies the staff position and alternate staff position responsible for the management and retention of the NVRA Agency Transmittal Forms, Voter Registration Preference Forms, and Voter Registration Applications.

When the staff position changes, the WIC Director or local agency designated staff must update the policy and immediately notify the Regional Nutrition Consultant (RNC).

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## Certification Periods

Individuals are initially certified for a defined period of time depending on their participant category. At the end of each certification period, individuals must “reapply” and be subsequently certified for program benefits to continue.

### ■ Initial Certification Periods

The length of the initial certification period is outlined below. At the end of the initial certification period, eligible participants must be subsequently certified according to the below defined schedule in order for WIC Program benefits to continue.

| Category of Participant   | Length of Certification Period  |
|---|---|
| <b><i>Women</i></b>   |   |
| Pregnant Women  | duration of pregnancy and until 6 weeks postpartum  |
| Postpartum Breastfeeding Women  | until 1 year postpartum or until 6 months when breastfeeding stops prior to 6 months or when breastfeeding stops between 6 and 12 months postpartum |
| Postpartum Non-Breastfeeding Women  | until 6 months postpartum, regardless of pregnancy outcome  |
| <b><i>Infants</i></b>   |   |
| Infants certified before 6 months of age                                  | until first birthday with the local agency ensuring that the infant receives the required health and nutrition assessments                          |
| Infants certified between 6 months of age and one year*                   | 6 months  |
| <b><i>Children</i></b>  |   |
| 1 to 4 years of age (certified until the day before their fifth birthday) | 1 year with the local agency ensuring that the child receives the required health and nutrition assessments   |

\*Note: in Crossroads, there are times that an infant initially certified in their 11<sup>th</sup> month will have a certification period of one year. Users are encouraged to create a plan of care reflective of the length of the certification period.

■ **Subsequent Certification Period Start Date**

Subsequent certification can be performed up to 30 days prior to the end of the current certification period.

The subsequent certification period for a child begins the day following the end of the initial/prior certification period.

The subsequent certification period for a woman begins on the day she is certified in a new participant category.

- When a local agency conducts a subsequent certification prior to the expiration of the current certification period and the individual is determined ineligible staff must provide food benefits for the remainder of the current certification period.

■ **Certification Period Extension**

A 30-day certification extension is an option when an infant or child needs a subsequent certification and scheduling difficulties occur. A one-time maximum 30-day extension is allowed when the current date is within 30-days of the end of the certification period. Refer to Chapter 8, Section 5 Food Benefit Issuance in Special Situations.

**ALLOWABLE PROOFS FOR IDENTITY AND RESIDENCE\*\***

| <b>Integrity Document<br/>(must be original documents, not copies)</b>   | <b>Proof of Identity<br/>(Must be in applicant's name)</b> | <b>Proof of Residence<br/>(Must include current physical address*)</b> |
|--|--|--|
| Affidavit (unmarried mothers)  | <i>(only for infants)</i>                                  | ✓  |
| Bill, account statement, or receipt less than 60 days old (e.g., bank, credit card, loan papers, mortgage/ rental, utility)  | ✓  | ✓  |
| Birth Certificate  | ✓  | <i>(only for infants)</i>  |
| Blank Check  | ✓  | ✓  |
| Check cashing, credit, or bank ATM card  | ✓  |  |
| Letterhead correspondence < 60 days old (with address and telephone number of source. (Note: postmarked forwarded mail and WIC generated correspondence is acceptable) | ✓  | ✓<br><i>(only if in applicant's name)</i>                              |
| Food and Nutrition Services certification letter   | ✓  | ✓  |
| Foster Child placement letter  | ✓  | ✓  |
| Hospital crib card or discharge papers   | ✓  | ✓  |
| Hospital ID Card or Bracelet   | ✓  | ✓  |
| Immunization Record  | <i>(only for Infants &amp; children)</i>                   | ✓  |
| Income tax filing for the most recent tax year   | ✓  | ✓  |
| Insurance Card or Insurance Policy   | ✓  | ✓  |
| LES (military Leave and Earnings Statement)  | ✓  | ✓  |
| Marriage License less than 60 days old   | ✓  | ✓  |
| Medicaid or Medicaid Presumptive Eligibility ( <i>Must first verify current eligibility</i> )  | ✓  | ✓  |
| Medicaid or NC Health Choice Approval Notice (DMA-5003)  | ✓  | ✓  |
| Mother's Verification of Facts (MVF) signed and dated' less than 12 months old   | <i>(only for infants)</i>                                  | ✓  |
| Paycheck stub or direct deposit notification <60 days old *  | ✓  | ✓  |
| Permanent Residence Card ("green card")  | ✓  | ✓  |
| Photo ID (current): DMV, US governmental agency, US passport, military, school   | ✓  | ✓  |
| Property tax statement   | ✓  | ✓  |
| Proof of birth letter  | <i>(only for infants)</i>                                  |  |
| Social Security card   | ✓  |  |
| Unemployment letter/notice   | ✓  | ✓  |
| Verification of certification (VOC) (for current certification period)   | ✓  |  |
| Voter registration card for NC   | ✓  | ✓  |
| Work ID card   | ✓  | ✓  |

| <b>Only at Recertification</b> |   |  |
|--------------------------------|---|--|
| Visual Recognition             | ✓ |  |
| **NC eWIC Card                 | ✓ |  |

\* May use image accessed from the internet and displayed on a smart phone if: a) applicant is observed accessing the image, and b) local agency staff can read the image and judges it to be authentic. Staff may decline to accept an electronic image and require original documentation (hard copies) if there is any question about the authenticity of the electronic image.

\*\* NC eWIC card can be used as identification after initial certification has been established. Local agency staff must ask participant/parent/guardian/caretaker their name, address and date of birth and confirm this information in Crossroads system. When an individual present is the proxy, identification must be established before food benefits can be issued according to allowable proof of identity.

When the applicant/participant only has items listing a post office box staff must document the physical address as well as the mailing address in the Crossroads system.