

December 8, 2021

Sarah Widor
Director, Supplemental Food Programs Division
Policy and Program Development Division Food and Nutrition Service
PO Box 2884
Fairfax, VA 22031-0885

RE: Request for Information: Center for WIC Modernization and Delivery

Dear Ms. Widor:

The Academy of Nutrition and Dietetics (the “Academy”) appreciates the opportunity to submit comments to the USDA in response to its request for information on the Center for WIC Modernization and Delivery (86 FR 61752). Representing more 112,000 credentialed nutrition and dietetics practitioners, the Academy of Nutrition and Dietetics is the world’s largest organization of food and nutrition professionals. We are committed to accelerating improvements in the nation’s health and well-being through food and nutrition.

The Academy is committed to improving the health of Americans by ensuring access to a nourishing, safe and affordable food supply. The dietetics practitioner and nutrition educators consider the health, safety and welfare of the public at all times. The Academy’s guiding principle is our commitment to improving health for all, especially those most susceptible to food insecurity. It is the position of the Academy that systematic and sustained action is needed to achieve food and nutrition security in the United States. To achieve food security, effective interventions are needed, **along with adequate funding for, and increased utilization of, food and nutrition assistance programs**; inclusion of nutrition education in such programs; strategies to support individual and household economic stability; and research to measure impact on food insecurity- and health related outcomes.¹ **The Academy supports efforts to establish a resource Center that would help to modernize the WIC program and therefore increase the utilization of the program to improve health outcomes for pregnant mothers, babies, and children. This is particularly important in addressing the significant health disparities experienced by pregnant mothers, infants, and children of color.**

The following comment is based on the Academy’s food security position and the results of an informal discussion among Academy member WIC experts. These experts represent stakeholder perspectives ranging from WIC research and program implementation to policy development and program outreach and education.

What capabilities should the Center have to effectively support State and local WIC agencies in implementing new technology solutions and process changes?

A prominent challenge reported by Academy members was the standardization of the data collected, shared, and reported on the WIC program across the country. For example, the current minimum data set required by states to be reported to USDA is aggregated and shared differently across management information systems (MIS). This resource Center could be a key strategy to streamline and standardize

¹ Holben, David H., and Michelle Berger Marshall. "Position of the Academy of Nutrition and Dietetics: food insecurity in the United States." *Journal of the Academy of Nutrition and Dietetics* 117.12 (2017): 1991-2002.

data collection across the country, which will allow for better outcome reporting on the program. Additionally, standardization and streamlining could help support efforts to merge existing data sets to share participant medical data more efficiently. This resource Center could assist in the development of a national data repository which would include MIS as well as electronic benefit transfer (EBT) data from across the US. It should also be a priority for the Center to provide training and support for state and local agencies to use their data for evaluation and program improvement.

Another challenge to modernization is current regulations that are unintentionally limiting the growth and evolution of the program. This Center could do a thorough review of all current regulations that should be updated in order to allow for program modernization. For example, physical presence requirements, EBT signature provisions, and WIC Farmers Markets all have regulatory challenges that restrict access to WIC participants.

It is critical that the Center have staff that are familiar with the operations of WIC agencies, including registered dietitian nutritionists, and can anticipate the needs of state and local WIC agencies. Ideally, the Center would already have a wide network of WIC agency content and be familiar with the challenges facing WIC agencies, such as the complexity of collaborating with programs with adjunctive eligibility and building effective participant portals.

How should the Center evaluate WIC State agency needs and prioritize projects?

The Center should strategically consider program needs and prioritize efforts that will help the most vulnerable communities. For example, the Center should focus on reaching rural communities and to address health disparities experienced by mothers and children of color as well as prioritizing tribal communities.

Additionally, the Center should create tools and resources that are stand alone and do not need consistent updates and changes. The Center should build on existing work in this space, as WIC stakeholders from the private, nonprofit, and government sectors are currently working to improve the WIC participant experience through many of the mechanisms described in the Request for Information. The Center should be able to support both promising practices that currently exist within WIC as well as emerging strategies that have not yet been tested.

How should the Center work with State and local WIC agencies to help them modernize their WIC programs and improve the participant journey through WIC?

The Center should provide practical, hands-on support for State and local WIC agencies. At the onset of the selected projects, the Center should conduct listening sessions so that all levels of WIC agencies and staff have an opportunity to speak directly to Center representatives. This will help create transparency in the process and would also allow for participation and input by the participants themselves, who are often an underutilized source of information.

The Academy recommends creating an advisory committee of local and State WIC agencies, WIC participants, and WIC technology vendors to help support the Center in designing and implementing modernization projects. It is also important to consider engaging with cyber security experts to ensure that data and participant information remains protected.

How should the Center share and promote the reuse of best practices, solutions, code, reference implementations, and other resources among WIC State agencies to help them address common operational issues that impact the customer experience?

The Center should convene an annual conference to share information and elevate the work of the people or groups who are doing the work on the ground. Additionally, the Center should also create an online repository with toolkits and other resources that can be accessed by WIC agencies across the country. It is critical that these resources are diversified enough to support different regions, levels of WIC programs, and ethnic and racial communities. The Center should emphasize the importance of state and local evaluation of modernization efforts and provide training and support.

To help state agencies modernize in the face of budget constraints, the Center should work to ensure that as much software used in WIC is open source as possible. The Center should have one or more people on staff who have the expertise to share code and can liaise with technology experts at state WIC agencies and technology vendors who provide software to state WIC agencies.

The Center should also strive to publish (or work with university partners to publish) more peer-reviewed literature exploring the effects of modernization on WIC participation and retention. The Center should be a member of WIC research collaboratives such as the Healthy Eating Research/Nutrition and Obesity Policy Research and Evaluation Network Learning Collaborative.

How would you define and measure success for the Center?

The Academy would define success in a number of ways, including increased participation and redemption of vouchers, number of visits to the Center's website, and the number of resources and tools created and disseminated.

Ultimately a successful Center would improve the recruitment and retention rates of WIC participants. Successful strategies will take time to affect these rates, so in the interim, measures of WIC participant satisfaction would be critical to measuring success of the Center. Further, WIC staff satisfaction should also be measured, as WIC staff have a real-time sense of how strategies are affecting their participants. Usefulness of the Center's resources and training should also be assessed.

What risks do you foresee in establishing a Center to support WIC State agencies? How would you mitigate those risks?

The biggest concern reported about the Center from Academy members was the additional layer of bureaucracy that might occur with the Center. The Center's role compared to USDA's role must be clearly defined and reporting burdens should not increase for local and State WIC agencies.

The Academy of Nutrition and Dietetics appreciates the opportunity to submit comments and applauds the USDA for making efforts to modernize the WIC program. Please contact either Jeanne Blankenship at 312-899-1730 or jblankenship@eatright.org, or Liz Campbell at 202-775-8277 ext. 6021 or ecampbell@eatright.org with any questions or requests for additional information.

Sincerely,



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