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December 8, 2021

Cynthia Long, Administrator, Food and Nutrition Services
cc: 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
86 FR 61752**

Dear Cynthia Long:

As the bipartisan, national membership association representing state and local health and human services agencies, the American Public Human Services Association (APHSA) appreciates the approach USDA Food and Nutrition Service (FNS) is taking to establish a resource center supporting agencies administering the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). APHSA's members administer many of the critical economic and nutrition support programs – such as SNAP, TANF, and Medicaid – that can work in tandem with WIC to support the health and well-being of families. We believe the alignment of nutrition and other foundational supports with WIC is critical to enabling access to the full range of nutrition and related supports that help people and communities achieve well-being. To this end, APHSA encourages FNS to prioritize cross-program and cross-agency alignment in the services provided and resources made available through the Center so that modernizations to the WIC program are in service of families' needs and integrated with other critical supports that advance social and economic mobility.

In addition to the comments provided here, APHSA is submitting a separate response in partnership with Share Our Strength, No Kid Hungry reflecting the on-the-ground work of supporting a cohort of six sites—Hawai'i, Kansas, Michigan, New Jersey, New Mexico, and Mecklenburg County, North Carolina— through the Coordinating SNAP and Nutrition Supports (CSNS) project. In these joint comments, we offer insights into the capabilities the Center should have and the tools and resources it can produce to accelerate and maximize the impact of WIC modernization, based on our work with the CSNS cohort. In this public comment, we offer

The American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.

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reflections on our broader experience working with health and human services administrators nationwide on policy and practice modernization.

Please reach out to Matthew Lyons at mlyons@aphsa.org with any questions or opportunities for further discussion and collaboration.

Sincerely,

Matthew Lyons

A handwritten signature in black ink, appearing to read "Matthew Lyons", with a stylized flourish at the end.

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Approach

Through our direct experience working with program administrators and technical experts across human services agencies and their vendor networks to drive evidence-based and sustainable systems innovations, APHSA has observed a persistent need for coordination across agencies, programs, and systems. In addition, research demonstrates that data matches between these programs identify large numbers of WIC-eligible families who are not participating in the WIC program, but are enrolled in other programs.¹ With their information already on file at a peer agency, this large WIC-eligible population can benefit from modernization efforts that facilitate co-enrollment in these programs. Thus, to effectively expand the reach of the WIC program and improve the WIC application and certification journey for participants, it will be critical for WIC agencies to coordinate with peer agencies administering benefits that confer adjunctive eligibility for WIC, such as SNAP, Medicaid, and TANF.

Coordinated access to nutrition supports can improve the WIC application and certification process in several ways, such as by:

- Creating closed-loop referrals between WIC, peer agencies, and community organizations;
- Simplifying the WIC application process for both participants and staff with the use of existing data on file at peer administering agencies;
- Automating adjunctive eligibility checks and streamlining certification and enrollment processes for clients by using tech and data solutions to remove the burden of documentation / verification from clients; and,
- Aligning SNAP, WIC and Medicaid participation requirements such as interviews, documents, certification periods, notifications and reminders to the extent possible.

It is important that the Center for WIC Modernization and Delivery center principles of equity and diversity in its support of agencies. Areas in which the Center can support equitable innovation through its provision of technical assistance and creation of tools and resources include:

- Analytics that enable targeted and tailored development of interventions that meet the needs of priority populations
- Technology-enabled solutions development, such as creating APIs automating WIC referrals from new SNAP, Medicaid, or TANF applications
- Data-driven outreach campaigns tailored to participants of SNAP, Medicaid and TANF programs who are not enrolled in WIC
- Research methods and implementation science frameworks that center participants in solutions development

¹ Jess Maneely, Benefits Data Trust, and Zoë Neuberger, CBPP, “Matching Data Across Benefit Programs Can Increase WIC Enrollment,” April 27, 2021, <https://bdtrust.org/cbpp-bdt-case-study-matching-data.pdf>. For state examples of the share of Medicaid or SNAP enrollees not enrolled in WIC, see Figure 2, “Substantial Share of Adjunctively Eligible Families Are Not Enrolled In WIC,” <https://www.cbpp.org/substantial-share-of-adjunctively-eligible-families-are-not-enrolled-in-wic-0>.

- Evaluation support to help track efforts with sound metrics and understand the impact of interventions on various populations

Across all these focused areas of technical assistance and support, we encourage the Center to prioritize fostering and disseminating best practices for aligning the planning, implementation, and evaluation of shared outcomes across WIC and related programs. To be successful, this must look at not just process and systems alignment, but also address organizational and cultural barriers to alignment that persist at local, state, and federal levels. In addition, it is important to approach the establishment of the Center and support of WIC agencies through the understanding that this work must be sustained and ongoing, requiring stable investment to make a significant impact. We therefore encourage USDA to consider how it will ensure the long-term viability of the Center, beyond the short-term infusion of WIC Modernization funding.

APHSA appreciates the opportunity to provide insights to help shape the development of this resource center. We believe the Center can become an important driver of equity-focused modernization and cross-agency collaboration to improve family's experiences participating in WIC and other programs that help people and communities achieve well-being.

Business Information

About the American Public Human Services Association

The American Public Human Services Association (APHSA) is a bipartisan national membership association representing state and local health and human services agencies and the subject matter experts that help execute their mission to improve outcomes for people nationwide. Building on our long-standing relationships with health and human services leaders, APHSA advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.