

WIC Eligibility Content Audit and Usability Evaluation Report

Published May 2023

Service Design Collective, Inc.

A public benefit company

Contact: wic.project@servicedesigncollective.com

Project summary	2
What to know about this research	3
Research activities	4
1. WIC eligibility website content audit	4
2. Pre-screener content audit	5
3. Pre-screener tool heuristic evaluation	7
WIC Eligibility Data Dashboard	8
Statistics at a glance	12
Research Findings	14
Website Technical Errors Review	14
Technical error criteria	14
Mobile-friendly content	16
Accessibility Review	17
Readability and Plain Language Review	20
Accurate and Timely Content	23
Non-English Language Resources	25
Pre-screeners	26
Recommendations	31
Pre-screeners	31
Security and Errors	33
Accessibility	35
Content Strategy	37
Mobile-friendly Design	41
Conclusion	43
Acknowledgements	44
Addendum	44
Appendix A: Definitions	45
Appendix B: Technology and timeline	47
Appendix C: Attachments	47
Appendix D: References and reports	47
Annendix F: Resources	48

Project summary

Service Design Collective is a public benefit corporation founded & run by alumni of the <u>United States Digital Service</u>. We focus on ways in which government programs & policies prevent people from successfully accessing critical services. We develop methods & tools to help governments keep pace with public needs, legislative changes & modern technologies. We empower our partners with knowledge & skills to continue their work long after we have completed a project.

The Special Supplemental Nutrition Program for Women, Infants, and Children, known more commonly by its abbreviation WIC, short for Women, Infants, and Children, is a food program administered by the United States Department of Agriculture (USDA). WIC provides food assistance, nutrition education, and health screenings to pregnant people and families with young children who earn less than 185% of the poverty line.

Although USDA controls funding, rulemaking, and policy, WIC is a federal grant given to U. S. states, territories, and Indian Tribal Organizations to manage benefit delivery. These 89 WIC entities currently manage benefits through a network of 1,900 local agencies and over 10,000 clinic sites. Note: this report focuses on entity-level eligibility information only.

WIC entities vary greatly in their size, population coverage, and resources, causing inconsistencies in information and benefit delivery. For example, some WIC entities have no website while others have specialized websites and online tools dedicated to WIC benefits. Other WIC entities are working to streamline services and increase participation by using new technologies, including online pre-screening forms that claim determine eligibility.

WIC enrollment has been <u>declining since 2011</u> for multiple and complex reasons. We used a variety of research reports and resources, including those from the <u>Center on Budget and Policy Priorities (CBPP)</u> and <u>National WIC Association (NWA)</u>, to examine why WIC enrollment is declining and understand how our research could add to this knowledge.

We focused on online eligibility information as one distinct part of the many challenges of increasing WIC enrollment. We explored the information people see online when they start their benefits journey, including what tools and resources they encounter when they research the WIC application process.

We began with a broad set of research questions and narrowed our focus down to foundational eligibility information:

- If a person looks for WIC online, what do they find?
- Is that information easy to understand?
- Is it accurate?
- Does it tell people what to do next?

We then audited the WIC eligibility web pages, pre-screening tools, documents, and online applications of all 89 entities. In addition, we audited federal WIC eligibility information, including the <u>USDA</u> and <u>Benefits.gov</u> pre-screening tools.

We evaluated a comparison set of state and federal pre-screening tools using a heuristic evaluation structure and the Nielsen/Norman 10 Usability Heuristics for User Interface Design. We also conducted a comprehensive content audit of all 89 entities' WIC eligibility web presence. Our evaluation included reviewing eligibility resources for readability, basic accessibility compliance, accuracy, and mobile device display.

Our findings include significant issues with consistency, accessibility, security, and equity. We also found the use of new technologies, such as pre-screening tools, to be poorly designed. Many of these findings can be easily addressed, while others will require additional planning or research. We have a robust set of research findings and potential areas of exploration for further research.

What to know about this research

A great website does not necessarily equal great service or program delivery. For example, the lack of a web presence does not mean an entity is not serving its community. This report examines just one aspect of WIC access: online eligibility information. Online web presence is one of many factors that can contribute to a successful WIC program. Depending on the needs of the participants the WIC entity serves, emphasizing other areas of WIC delivery may better serve their community.

Our research was originally conducted in July and August of 2022, creating a snapshot in time of WIC eligibility across all 89 entities. We shared early findings from our research with the WIC community before we published this report. In the time since our research and review, entities have made changes and corrections,

launched new websites, and implemented program updates. Recommendations from this report may already be in progress, done, or may no longer be relevant.

We did not review every page on a WIC entity's website. We focused on online eligibility information and pre-screening forms. This means we may have missed eligibility information or additional resources located or repeated on other pages or in other parts of a website.

WIC entities do not have equal access to technology resources or control over their websites. Some communities may have technology barriers like spotty mobile signal coverage and slower or no broadband service. Some communities have less money than others for digital products, technical infrastructure, and website support.

Our content review categories are broad and do not indicate how severe an issue is on a particular page. For example, two pages may both be marked as not mobile friendly. One page may have an improperly sized graphic while the other page may not have a mobile version at all. When reviewing our research, keep in mind that our work targeted broad trends rather than specific fixes for individual entities. Complete heuristic data is available upon request; please send requests to wic.project@servicedesigncollective.com.

Research activities

Our research is organized into three major evaluations:

- 1. A comprehensive content audit of online WIC eligibility information
- 2. A content audit of pre-screening tools
- 3. A heuristic evaluation of pre-screening eligibility tools specifically to measure ease of use

1. WIC eligibility website content audit

We reviewed the content of each WIC entity's web presence, including the USDA and Benefits.gov WIC eligibility websites. Our review focused specifically on the web pages and digital materials related to eligibility information. Although we attempted to be comprehensive, we may have missed content, links, or other resources located in other sections of a WIC entity's website.

The following topics give an overview of what we included in our content audit review. Detailed results and criteria are available in our findings section.

General web presence: Can people get WIC eligibility information online?

We reviewed each WIC entity for its general web presence, noting if they maintained a WIC-specific web presence, if the website used basic security features like HTTPS (secure hypertext transfer protocol), major errors like broken links or page rendering problems, site speed and load times, and other standard web-based criteria.

Mobile-friendly: Does this work on a phone?

We reviewed each WIC entity that had a web presence for how well their pages worked on mobile devices. We noted if the WIC entity had a mobile-compliant website as well as mobile rendering issues such as small text, side scrolling, navigation, and other issues.

Accessibility: Can people with disabilities access this information?

We reviewed each web page for basic accessibility criteria according to the <u>Web</u> <u>Content Accessibility Guidelines (WCAG)</u> single A guidelines.

Plain language and readability: Is this information easy to read and understand? We reviewed sample web content from each eligibility page for average reading grade level, noting complex words or confusing terms.

Accurate and comprehensive content: Is this information correct, complete, and up to date?

We reviewed eligibility content to make sure it contained current information, especially 2022-2023 income levels. We also checked WIC criteria, noting if "who is eligible," "income levels," "nutrition assessments," "qualifying programs," and "residency" were clearly stated and explained.

Non-English language resources: Can people get this information in a language other than English?

We reviewed each WIC entity's web presence for non-English language eligibility resources, noting what type of resources were available online and in what languages.

2. Pre-screener content audit

Pre-screeners are quizzes, forms, or questionnaires that ask people a series of questions and then give them an anticipated eligibility result based on their answers. Pre-screeners are different from portal registrations or contact forms because they do not keep the information they collect or pass the information on to

a WIC office. USDA, Benefits.gov, and four WIC entities maintain online pre-screeners. We created a separate content evaluation that applied specifically to these tools. Our criteria are outlined below.



Figure 1: Screenshot (August 2022) of the desktop version of the USDA pre-screener containing an explanation of the tool and a get started button.

This pre-screener is linked to from many WIC entities. The tool asks a series of in-depth questions and gives people a result with links to a variety of nutrition services.

Question text: What information are these forms asking for?

We reviewed each pre-screening form question, noting what is commonly asked when assessing WIC eligibility.

Help text: Does the question provide helpful information?

We reviewed each question for help text, noting what that text said and how that information was displayed.

Question error states: Does the form help people recover from errors?

We noted what happened when people failed to answer a question or otherwise made an error, including what message was displayed and where on the page the error alert was present.

Page and functional errors: Does the pre-screener work as intended?

We reviewed each form question or page for errors including checking to see if the question matched the answering format (example: using radio buttons for single selection questions vs using checkboxes for multiple selection questions), back button usage, rendering, loading, and general form functionality.

Mobile compliance: Does this work on a smartphone?

We reviewed each step of each pre-screening tool for mobile device display the same way we reviewed eligibility web pages.

Accessibility: Can people with disabilities access this information?

We reviewed each step of each pre-screening tool for accessibility criteria according to the Web Content Accessibility Guidelines (WCAG) single A guidelines.

3. Pre-screener tool heuristic evaluation

In addition to our pre-screener content audit, where we focused on the specific information each tool was asking people, we performed a usability heuristic evaluation on the two federal and four state pre-screening tools. We used the Nielsen/Norman Group's 10 Usability Heuristics for User Interface Design, a standard evaluation tool used widely across the technology industry to evaluate applications and websites. Ratings were given to pre-screening tools as pass, partial, and fail. More detail about our criteria can be found in our usability findings.

** service design collective WIC Eligibility Web Presence Data Dashboard Data collected July-August 2022	Has WIC web presence	Secure, reliable, and error-free	Mobile-Friendly	WCAG A Compliant	Accurate and up-to-date	Non-English Resources	Pre-screener
Acoma-Canoncito-Laguna		•	•	0	0	0	
Alabama	•	•	•	0	0	•	X
Alaska		•	0	0	0	0	X
American Samoa	•	•	•	0	•	0	
Arizona			0	0			
Arkansas	•	•	•	•	•	0	
California			0	0			*
Cherokee Nation of Oklahoma		•	•	0		0	
Cheyenne River Sioux Tribe		•				0	
Chickasaw Nation	•	•	•	0	•	0	
Choctaw Nation of Oklahoma				0		0	
Citizen Potawatomi Nation		•	•	0	•	0	
Colorado			0	0			
Commonwealth of Northern Mariana Islands		•	0	0	•	0	
Connecticut			•	0		•	
Delaware	•	•	0	0		•	
District of Columbia				0			X
Eastern Band of Cherokee Indians	•	0	•	0	0	0	X
Eastern Shoshone Tribe§	0	0	0	0	0	0	
Eight Northern Indian Pueblos Council	•	•	•	0	•	0	
Five Sandoval Indian Pueblos Council			•	0		0	
Florida		•	0	0	•	•	X
Georgia		0			0		X
Guam		0	0	0	0	0	X
Hawaii		•		0		0	X
Idaho	•	•	•	•	•	•	
Illinois			0	0		0	X
Indian Township Passamaquoddy§	0	0	0	0	0	0	
Indiana			0	0		•	X
Inter Tribal Council Of Arizona			0	0	•	0	

** service design collective WIC Eligibility Web Presence Data Dashboard Data collected July-August 2022	Has WIC web presence	Secure, reliable, and error-free	Mobile-Friendly	WCAG A Compliant	Accurate and up-to-date	Non-English Resources	Pre-screener
Inter-Tribal Council of Nevada				0	0	0	
Inter-Tribal Council of Oklahoma	•	0	0	0	0	0	
lowa			0	0		0	
Kansas			0		0		
Kentucky				0			X
Louisiana		0		0			
Maine							X
Maryland	•	•		0	•	•	
Massachusetts				0		0	
Michigan			0	0			*
Minnesota							
Mississippi			•	0		0	
Mississippi Band of Choctaw Indians			0	0		0	
Missouri				0			X
Montana			0	0	0		X
Muskogee Creek Nation				0		0	
Navajo Nation [§]	0	0	0	0	0	0	
Nebraska				0			
Nevada				0		0	
New Hampshire			0	0			
New Jersey			0	0		0	
New Mexico				0	0		*
New York				0			X
North Carolina		•	0	0	•		X
North Dakota				0			X
Northern Arapaho Tribe		0	0	0	0	0	
Ohio			0	0			X
Oklahoma		•		0	0		X
Omaha Tribe of Nebraska [§]	0	0	0	0	0	0	
Oregon				0		0	X

service design collective WIC Eligibility Web Presence Data Dashboard Data collected July-August 2022	Has WIC web presence	Secure, reliable, and error-free	Mobile-Friendly	WCAG A Compliant	Accurate and up-to-date	Non-English Resources	Pre-screener
Osage Nation				0		0	
Otoe-Missouria Tribe			0	0	•	0	
Pennsylvania				0			
Pleasant Point Passamaquoddy		0	0	0	0	0	
Pueblo of Isleta				0		0	
Pueblo of Zuni [§]	0	0	0	0	0	0	
Puerto Rico				0			
Rhode Island		•	•	0		•	X
Rosebud Sioux Tribe		0		0	0	0	
San Felipe Pueblo		•		0	•	0	
Santee Sioux Nation ^{§§}	0	0	0	0	0	0	
Santo Domingo Pueblo	•	0	0	0	0	0	
South Carolina				0			
South Dakota			0	0	•	•	*
Standing Rock Sioux§	0	0	0	0	0	0	
Tennessee		•	0	0		•	X
Texas				0			
Three Affiliated Tribes		•	•	0		0	
U. S. Virgin Islands		0	0	0		0	X
Utah	•	•	0	0	•	•	X
Ute Mountain Ute Tribe		0	0	0	0	0	
Vermont			0	0			X
Virginia			0	0			
Washington			0	0			
West Virginia				0		0	
Wichita and Affiliated Tribes§	0	0	0	0	0	0	
Winnebago Tribe				0	0	0	X
Wisconsin			0	0		0	X
Wyoming				0			



WIC Eligibility Web Presence Legend and Definitions

Data collected July-August 2022

Meets criteria	X Links to USDA pre-screener				
O Does not meet criteria	* Entity has its own pre-screener				

Has WIC web presence: Entity maintains its own WIC web presence with some program and eligibility information on its official website.

- § Entity has an entity-run website, but either does not list any WIC program information or only lists basic contact information.
- §§ Entity does not have an entity-run website.

Secure, reliable, and error-free: Website uses HTTPS as the default setting. Site is free from security warnings, server timeouts, or other major security issues and functional errors. Pages do not contain broken links or images.

Mobile-Friendly: Website has a mobile version and web content renders well on mobile devices. Mobile web experience matches the desktop experience. Page elements are sized appropriately for small screens. Note that this data point ranges in severity.

WCAG A Compliant: Eligibility web pages meet single A WCAG compliance levels based on machine review using the WAVE accessibility review tool.

Accurate and up-to-date: Eligibility information is truthful, current, and links to correct documents and websites.

Non-English Resources: Entity provides non-English materials or page translations, clearly outlines non-English support methods like language lines, or provides machine translation options as part of the entity's web presence.

Pre-screener: Entity links to the federal USDA pre-screener or maintains their own pre-screener.

Statistics at a glance

Eligibility information results

- 6 entities listed all the eligibility criteria on their web pages.
- 17 entities had inaccurate information, out-of-date information, or information so minimal it was not helpful. Most inaccurate information was related to old or improperly calculated income rates.
- 75 entities listed partial or incomplete eligibility information on their eligibility-related pages. Information most often omitted were nutritional need, nutritional assessment, qualifying program information, and clear information about non-mother caregivers.

General web presence

- 9 WIC entities had a limited web presence. All 9 entities with a limited web presence were Indian Tribal Organizations.
 - 7 entities had a primary website, but that website did not contain WIC information beyond phone numbers.
 - 1 entity had a WIC website built using a free website service with almost no program information. This website counted in our statistics as a WIC web presence.
 - 1 entity had no entity-run website at all.
- 18 WIC entities had a WIC-dedicated microsite separate from the main tribal, territory, or state website. Some of these entities also had one or more pages on their main website in addition to these WIC-dedicated websites.
- 4 WIC websites did not use secure HTTPS for their main web presence. Two
 of these entities had a https version of their WIC website, but the non-https
 version is either linked from other pages or was first in search results.

Mobile compliance

- 2 WIC entities did not have a mobile version of their website.
- 34 WIC entities had some issue with mobile compatibility on at least one of their eligibility web pages.

Accessibility

 74 WIC entities had accessibility issues on one or more pages of their website. 99 individual web pages were flagged by WAVE, an automated browser tool, or visual inspection as having at least one WCAG single A level issue. Note that many entities had multiple web pages with eligibility information.

Readability grade level

About 80% of eligibility pages required a high school level of education or above to read. The grade levels broke down as the following:

Grade School: 1 page
Middle School: 19 pages
High School: 43 pages
College: 37 pages

Non-English language resources

- 40 WIC entities provide non-English language resources or translation options of some kind on their pages.
- Puerto Rico's WIC website is in Spanish and is the only non-English language website of all the WIC entities.
- 20 WIC entities provide machine translation options like Google Translate.
- Spanish is the most common non-English language offered in translated materials.

Research Findings

Website Technical Errors Review

81 WIC entities had a web presence of some kind. We reviewed each website for its over-all use of basic web security practices. We also noted website errors or issues as part of our larger content audit whenever we encountered them.



Figure 2: Screenshot (August 2022) of 500: Server Error message from the USDA WIC pre-screener website.

We frequently encountered this 500: server error when attempting to access the USDA WIC pre-screener several times during our review. This error would appear unpredictably when attempting to use the pre-screener or follow links from websites or search engines.

Technical error criteria

Our review included recording basic technical errors that occurred while reviewing the general web presence of a WIC entity. We did not perform a formal technical audit, instead noting issues a person may encounter when trying to get eligibility information. Specifically, we noted the following:

- If a WIC entity had an entity-owned website
- Dedicated WIC website or pages vs a general government website
- HTTPS: Use of secure hypertext transfer protocol for WIC web pages and files
- Broken links
- Public-facing tools and resources that are no longer maintained or have been replaced
- Missing or broken page elements like images or graphics
- Pop-up errors
- Browser warnings
- Page load issues and errors (such as <u>404</u> page not found errors or <u>500</u> server errors)

HTTPS and insecure page errors: Most WIC entities used HTTPS for their websites, a critical security setting that prevents harmful redirects or tracking while people navigate websites. Websites that don't use HTTPS are often hidden from search engine results and give warning errors when using the website. Web browsers may even block people from accessing insecure pages like portals and web forms that collect data.

Broken page elements: Many WIC web pages had one or more broken elements like graphics, links, or embedded elements on their pages. Although usually minor, these issues can make pages look unreliable or inaccurate and decrease trust in the content. Broken links and functionality prevent people from completing tasks or getting more information.

Deprecated Pre-screening tool: The <u>USDA hosted (as of February 2023) a</u> <u>deprecated pre-screening tool</u> that was findable by people using search engines. At least two WIC entities were still using this tool. This tool collects information but may not provide accurate results. USDA said in a banner (see "banner blindness," below) on the page that it is "not the official WIC Prescreening Tool." USDA provided a link to the updated tool, but had not removed the tool or automatically redirected the link to the proper site.

Mobile-friendly content

We reviewed every website for how well it renders on mobile devices. Mobile devices account for about 50% of government web traffic according to public federal website data. Low-income households are more likely to access the internet through their phones.



Figure 3: Screenshots (August 2022) of the state of Alaska's WIC Eligibility web page on the left and WIC Income Guidelines web pages on the right displayed on an iPhone SE screen for scale.

At the time of our review in July and August of 2022, Alaska's state website did not have a mobile version, making it difficult to use on smaller screens.

How we measured mobile friendliness

We tested each web page on an iPhone SE using home Wi-Fi internet speeds. We reviewed each page for its accuracy and rendering on mobile screens, including the following criteria:

- Mobile website was available
- Mobile website and desktop website content matched
- Pages and menus rendered well on smaller screens
- Page text, graphics, and content scaled appropriately to smaller screens

PDFs on mobile devices: Portable Document Formats, or PDFs, are a common type of digital document. Much of WIC income information, including detailed breakdowns of income level by household size was contained in PDFs. PDFs have display issues on mobile devices, generally loading as whole pages with very small text. PDFs force people to scroll, pinch, and zoom to find critical information. These documents also open in a new tab or mobile window, making it harder to navigate back to pages with useful next steps.

Improperly sized embedded content: The most observed mobile issue was improperly sized content like images, infographics, tables, and videos embedded in pages. Income tables often were not coded correctly to scale or render on mobile devices (see example images), hiding some of the content and forcing the page to scroll or shift sideways when trying to access page content.

Information-dense graphics with program or income information: These graphics often appeared extremely small on mobile screens, forcing people to zoom in very closely. Even zooming often did not make these page elements readable.

Rendering problems: Many pages had issues with page elements like menus, breadcrumbs, and blocks of content rendering improperly or in an order that did not match the desktop reading experience.

Accessibility Review

Web accessibility covers a wide range of criteria that helps people with different physical, perception, and cognitive abilities access information online. Although accessibility guidelines are designed to make websites usable for these people, accessibility benefits everyone. For example, high contrast websites make text easier to read for people with vision issues, but also make reading easier in bright sunlight.

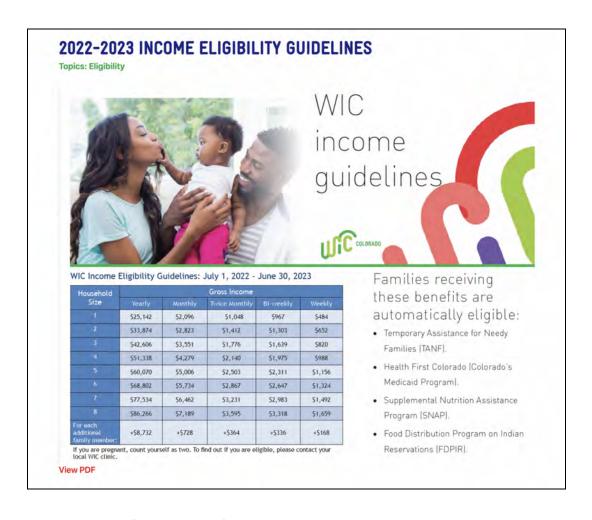


Figure 4: Screenshot (August 2022) of the WIC income guidelines page on the state of Colorado's website.

Colorado provided income information in a complex graphic with a link to a machine-readable PDF. The ALT text says "Photo of WIC Income Eligibility Guidelines 2022-20223 [sic]" with no image description on the page. This image also appeared slightly blurry and pixelated on the web page.

Web Content Accessibility Guidelines (WCAG)

Web Content Accessibility Guidelines, or WCAG, are a set of criteria designed to make web content usable for people with a variety of disabilities. These standards are governed by the World Wide Web Consortium (W3C), an international non-profit organization that focuses on all aspects of web standards. WCAG covers all web content and is a living set of standards, always evolving and reacting to changing technology.

WCAG compliance is broken down into three levels: <u>A, AA, and AAA compliance</u>. Single A level compliance is considered the minimum standard for meeting accessibility guidelines. W3C provides detailed guidelines for all levels of compliance which have <u>multiple success criteria</u>.

How we measured accessibility

Our accessibility review focused on WCAG single A level guidelines, the minimum accessibility requirements for online content. We used the <u>WAVE accessibility tool</u> to render each web page we tested in Google's Chrome browser. We also visually inspected the page to note small text size, use of red text, or all caps. We read alternative descriptions (<u>ALT text</u>) for images and verified WAVE results visually.

WAVE is an automated tool. It will miss certain accessibility issues or may flag issues incorrectly. When applicable, we noted results that may be inaccurate. Although useful, WAVE and other automated tools are not substitutes for testing with community members and software tools like screen readers. For those reasons, this accessibility review is a starting point rather than a comprehensive set of findings.

Color usage and contrast: WCAG refers to color usage and contrast as luminance; the perceived brightness of a color compared to its background field. The preferred contrast ratio is 4.5:1 for all informational text. WebAIM has extensive detail on contrast and color usage. Many WIC websites have low contrast issues, especially with text overlaid on colored backgrounds. Yellow, light green, and medium gray text color choices are particularly problematic.

Text size: WCAG does not specify a minimum text size for pages, instead advising text must still be readable at 200% of its original size if a person overrides defaults. Small text size is noted on pages as it forces sight impaired people to change the font settings manually. WebAIM outlines general good practices for text including font considerations, spacing, and size.

Descriptive ALT text and image descriptions: <u>ALT text</u>, also known as an alternative attribute, or alternative text is the text that is shown when a page element like a picture, graphic, or table, can't be rendered on screen. ALT text is usually short and descriptive. ALT text is an important accessibility element as it helps people who use screen readers or text-only browsing options navigate pages and understand what information is presented on a page. Descriptive ALT text also aids in search engine optimization, making content easier to find via searching.

Image descriptions are longer text explanations usually consisting of sentences or a paragraph that describe the information and content of the image in more detail. Unlike ALT text that is only visible when an image can't be displayed, image descriptions are sometimes visible to all users as captions or additional text. Image descriptions provide more context about the image or graphic as it relates to the content of the page and is important for explaining complex graphics or images.

Although many images on WIC websites contained ALT text, fulfilling the minimum requirements for "single A level" compliance, they lacked the descriptive details that tell people what information the image actually contains. ALT text is particularly problematic on income table images, typically lacking detailed descriptions of the income levels. WCAG provides excellent guidance on how to properly tag complex images that contain information tables and graphs.

Missing labels: Page elements require labels to allow people to navigate through pages and understand what part of the page they are viewing. Label errors are often built into the structure of the web page. WCAG provides an overview of labeling regions and form elements for better navigation.

Readability and Plain Language Review

As part of our larger content review and heuristic evaluation, we reviewed every website for its readability, including estimated reading grade level for text, reading the text to identify plain language patterns, and flagging design elements that might interfere with people reading information.

Plain language guidelines

Plain language or plain writing guidelines have many layers and are adapted based on audience. Our review criteria is based on principles outlined from <u>plain</u> <u>language.gov</u>. Based on the <u>Federal Plain Writing Act of 2010</u>, these standards help Federal agencies and programs conform with the law and help people find the information they need to take next steps.

How we measured reading level

Reading level was scored by sampling 2-3 paragraphs of text on each web page that had 3 or more text paragraphs using an online scoring tool. PDFs, pages with fewer than 3 paragraphs of text, individual graphics, and files were not rated. We used the <u>Flesch–Kincaid readability tests ratings</u> as our measurement. Ratings were put into

range levels including Grade School (grades 1-5), Middle School (grades 6-8), High School (grades 9-12), and College (12+) as machine ratings are approximate.

How we reviewed pages for plain language

Plain language guidelines are contextual and based on audience, in this case potential WIC participants. Our review made general notes on plain language issues that arose from readability scores and cross-entity patterns. We focused on reviewing text for jargon, acronyms, and uncommon terminology. We also noted where text was copied from legislation or official memos or from the USDA website.

Jargon, acronyms, complex words and uncommon terms: Many WIC web pages used complex language, often copy/pasted from USDA memos and guidelines, on their pages. This type of text can be very hard to understand, especially for people who may not be familiar with the program already or who speak limited English.

For example, "postpartum" is used on most WIC eligibility pages as one of the ways a person can qualify for the program. The word "postpartum" is not commonly used in conversational English and is often associated with postpartum depression or other medical issues. "Postpartum" also lacks important details that can impact eligibility, like how long a parent would qualify for WIC after having a baby.

Missing or confusing descriptions: If a complex or uncommon term must be used, either because it is legally required or it is the most accurate, it should also be defined in plain language. For example, many WIC web pages stated that "low income" "households" qualify for the program. Both "household" and "low income" must be defined in clear, plain terms for people to understand if they or their children qualify. This is especially important as household and income determinations vary between public benefit programs, including among food assistance programs.

Banners and alerts: People tend to ignore content that is stored in formats that look like ads or are in places ads are traditionally found, a phenomenon called banner
blindness. In August 2022 when we conducted our review, the United States was experiencing multiple baby formula recalls and ongoing COVID-19 impacts. Many WIC web pages had multiple banners, so many that people must scroll through many layers to get to relevant content. These banners make every page they appear on harder to read. Too many banners, especially those with warnings that don't seem relevant to the page the person is on, can visually overwhelm people, causing them to ignore the important information contained in the banner warnings."

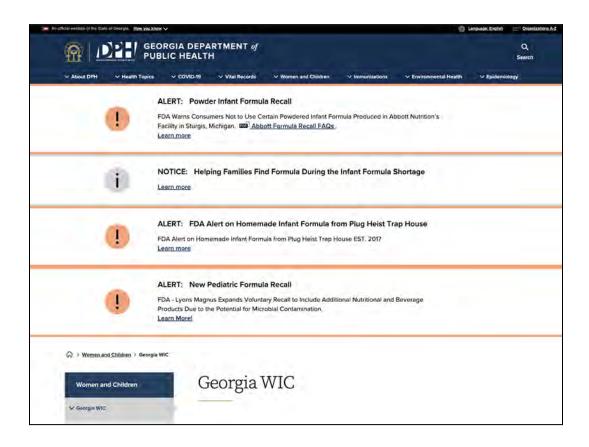


Figure 5: Screenshot (August 2022) of Georgia's WIC web page with multiple banners and alert messages at the top of the page.

During our review in July and August of 2022, the United States experienced a national baby formula shortage. Georgia's website had multiple banners about this shortage. Although formula recall information was very important and greatly impacted WIC participants, these alerts seemed similar, and it was not clear where to start to get information. Basic program information was pushed very far down the home page.

Text style and format: Plain language guidelines suggest <u>using design elements to increase scanning</u>, particularly on web pages which may be read on smartphones and small screens. WIC eligibility information was often part of a longer page with large, dense blocks of text. Text color, use of ALL CAPS, very small text, color usage and other design elements can also confuse readers, causing them to miss words, context and meanings.

Accurate and Timely Content

As part of our larger content audit and heuristic evaluation, we reviewed each entity's WIC web pages and PDFs for accuracy and up-to-date information. Accurate

and comprehensive information sets expectations, telling people exactly who qualifies for the program and what the program requires of them to apply.

Up-to-date information helps people take next steps quickly and with confidence.



Figure 6: Screenshot (August 2022) of American Samoa's WIC How to Apply web page with phone numbers and eligibility information.

American Samoa's WIC page did a good job explaining that fathers can apply and that people don't need a job to get WIC. It also uses program jargon like "category" to describe the people who can get WIC and "185% of the Federal Poverty Line" to describe the program income rules.

How we measured accuracy and up-to-date information

We reviewed each WIC eligibility page and PDF for accuracy and timeliness. These criteria included flagging out of date or inaccurate information on pages. Our specific emphasis was on income guidelines, making sure 2022 information was displayed correctly.

We also read the content of each page and reviewed the information for comprehensive eligibility requirements. We looked to see if the page included qualifying information about:

- Income guidelines
- Pre-qualifying programs like SNAP (Supplemental Nutrition Assistance Program), TANF (Temporary Assistance for Needy Families), Medicaid, and other state-specific programs
- Pregnant people
- Children under 5
- Other caregivers who can apply for benefits on behalf of children
- Residency requirements
- Nutritional need
- Nutritional assessment

Out-of-date income information: Of the web pages that were flagged as having out of date information, the most common issue was old, misleading, or incorrect income information. These included PDFs and brochure materials with past year income numbers.

Vague income information: Many WIC web pages, especially those of smaller WIC entities mentioned "low income" or "185% of the poverty line" when referring to who is eligible for the program. People may not know the term "poverty line" or understand that it changes every year. Low income is not specific enough to be helpful.

The United States Department of Health and Human Services (HHS) <u>calculates</u> <u>poverty guidelines differently</u> from the <u>Census Bureau</u>. Even programs within the USDA, such as WIC and SNAP, do not calculate income requirements the same way or use the same standards or thresholds.

Pre-qualifying program information: Multiple WIC web pages did not mention that people who already get Medicaid, SNAP, TANF, state food assistance or health care and other programs automatically meet income requirements for WIC. This is especially important because it can lead to benefits for families that would not otherwise qualify for WIC.

Residency guidelines: Many WIC entities did not have clear residency guidelines, especially Indian Tribal Organizations that may have additional requirements like tribal enrollment or reservation residency. Additionally, many WIC programs allow

people to receive benefits in the state where they work rather than the state they live in, very relevant to people who live on state and entity borders.

Diverse caregivers: Many WIC entities focused only on women, particularly pregnant women, as WIC participants. The common name for the program, Women, Infants, and Children, implies this as well. Any caregiver can sign their qualifying child up for benefits, however, not just mothers.

Nutritional need and assessment: Many WIC entities did not mention nutritional needs as part of the WIC program even though it is one of the main qualifying factors. Very few WIC websites contain any details about the nutritional assessment, including important steps like blood draws, weight assessment, and health screenings.

Non-English Language Resources

We visited each eligibility web page and reviewed its content for non-English language WIC eligibility information. We focused on eligibility resources available on eligibility pages, noting the type of resource available, languages offered, and the general content of the resource. We did not review every possible resource offered on all WIC pages.

Lack of resources: Less than half of all WIC entities offered non-English language resources that are easily findable from eligibility pages. <u>21.7% families do not speak</u> <u>English at home.</u> <u>26.5% of adult WIC participants were born outside of the USA</u>.

Reliance on machine translations: Most commonly WIC entities offered machine translations like Google translate either site-wide or on WIC web pages. Machine translations provide a minimal experience for people who speak limited English. Prone to errors, grammatical mistakes, and wrong word choices, machine translations can mislead or confuse people using the service.

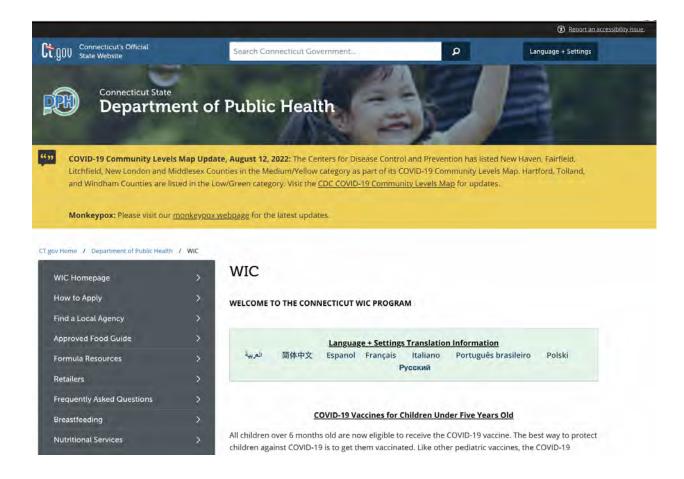


Figure 7: Screenshot (August 2022) of Connecticut's WIC web page with a large COVID-19 banner and multiple language links at the top of the page.

Connecticut provided machine translation services on their web pages in multiple languages. The links to the different languages on this page did not go to materials but instead gave people instructions on how to use the language feature which is not clear in the English language description.

Pre-screeners

We identified and evaluated the following WIC pre-screening tools on state and federal websites:

- USDA WIC pre-screener
- Benefits.gov WIC pre-screener
- California pre-screener
- Michigan pre-screener
- New Mexico pre-screener
- South Dakota pre-screener

Pre-screeners are quizzes, forms, or questionnaires that ask people a series of questions and then give them an eligibility result based on their answers. Pre-screeners are different from things like portal registrations, pre-applications, or contact forms because they do not keep the information they collect or pass the information on to a WIC office.

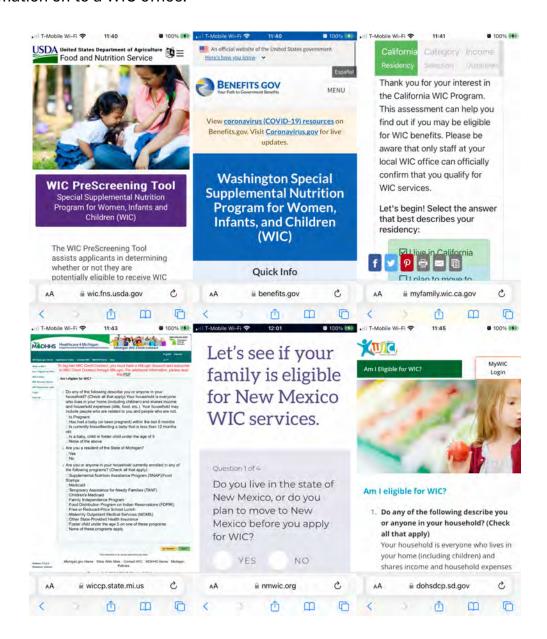


Figure 8: Screenshots (August 2022) of the 6 pre-screeners reviewed in this report taken on an iPhone SE mobile device. From the top left clockwise: USDA, Benefits.gov, California, South Dakota, New Mexico, and Michigan.

Heuristic evaluation criteria

Our scoring was based on the Nielsen/Norman Group's 10 Usability Heuristics for User Interface Design, a standard evaluation tool used widely across the technology industry to evaluate applications and websites. Ratings were given to pre-screening tools as pass, partial, and fail.

Pass: Meets standards. Few or no problems observed. Pre-screener supports user success and task completion.

Partial: Meets some but not all the standards. Problems observed may impact how easily users can complete their task or move to the next step but do not cause user error or task failure.

Fail: Does not meet standards. Multiple problems or major problems cause user error or task failure.

Heuristic Evaluation Results

All the pre-screening tools failed multiple heuristic criteria for usability. Many tools had severe errors, like server crashes, page load errors, and other basic functionality issues that prevented users from proceeding with the form. In addition, pre-screening tools also had issues helping users with complex questions, functional consistency, and more.

Instability: USDA, South Dakota, and Michigan presented major stability issues with their pre-screening tools. These issues included pages failing to load, unexpected server errors, and pages that had unexpected time limits.

Abandoned tools: Many pre-screeners were out-of-date, seemingly abandoned, or no longer maintained. Despite that, they remained available online and other pages continue to link to them. For example, an <u>old version of the USDA screener</u> allows people to fill out the form but cannot be successfully submitted. At least two entities directed people to this outdated tool.

Format errors: All pre-screening tools were a web form or quiz of some type. Every pre-screener presented issues with question format, consistency, and rendering. Lack of in-line help messages, and inconsistent use of radio buttons and checkboxes. Graphic issues were observed when filling out these forms.

Hiding information in a form: Pre-screening tools were sometimes the only source of detailed eligibility information, like income rates or family size, listed on a website. These tools forced people to fill them out to get information that could be presented in a scannable format like an income table or bulleted list.



Figure 9: Screenshot (August 2022) of old USDA pre-screener that looks exactly like the active version except with a small pink and red top warning banner.

This old version of the USDA pre-screener was still live and available to the public as of February 2023. People can fill out the screener and get all the way to the end before receiving a server error, making this appear to work. People may miss the banner warning at the top of the page, due to banner blindness or poor color contrast.

Data disclosure: Pre-screeners asked for complex and sensitive information, like pregnancy status, income, and family size but didn't collect or store this data in a meaningful way. This makes people disclose sensitive information about themselves to get basic program information.

Deceptive: The pre-screeners we reviewed sometimes looked like application forms. Because of this format and how in-depth some of these were, people could think they applied for WIC when they did not.

Distracting: Pre-screening tools often took people away from places they can find useful next steps. For example, the USDA pre-screening tool, linked to by many

states, is a separate federal website. In some cases, an entity's website would send applicants to the USDA pre-screening tool that, in turn, sent them back to the entity website. This setup created a loop without delivering adequate answers or clear next steps. These tools have the potential to derail people from going to their next application step through a local WIC office or program contact.

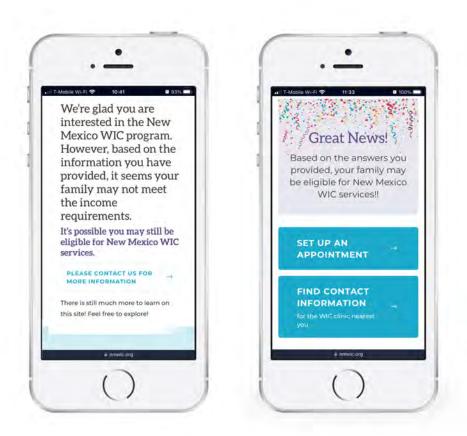


Figure 10: Screenshots (August 2022) of the New Mexico WIC pre-screener results pages displayed on an iPhone SE to show scale. The screen on the left shows a non-qualifying answer to the New Mexico pre-screener compared to the qualifying answer on the right.

Although styled and messaged differently, both results directed people to contact WIC, providing the same next step regardless of qualifying result.

Inaccurate: Pre-screening tools may not be accurate in their results. Exact income can be hard to calculate, household size is confusing, and guesses might result in deceptive answers. Pre-screening tools can create false confidence or, worse, turn away eligible families.

All results are the same: Filling out these forms should give people one of two results: yes, you qualify for WIC or no, you don't. In practice, pre-screening tools do not give a definitive answer either way. Regardless of a yes or no answer, pre-screening tools told people the same thing: "Call your local WIC office."

Information System limitations: Pre-screening tools did not interface with backend systems, known as <u>Information Systems</u> (IS). IS are privately developed back-end systems for WIC entities. USDA established the requirements for IS vendors in the <u>Functional Requirements Document for a Model WIC Information System</u> (FReD) in 2008. As defined by the FReD, IS "should support a number of program operations and management functions, such as certifying applicants, monitoring food vendors, tracking participation and expenditures and managing appointments."

FReD guidelines do not address the integration of data generated by pre-screeners or external applications. While the FReD allows for interfaces between some IS, there is no requirement to build other data intake processes, such as an Application Programming Interface (API). An API is technology that lets technical systems share and use common information.

Recommendations

Pre-screeners

Use direct, concise web page content instead of pre-screeners. Pre-screeners ask people to give personal, sensitive information to get basic program information. Going through a pre-screener, especially more complex ones like the USDA pre-screener, takes a lot of time.

Most pre-screeners look like application forms. This may mislead people by making them think they applied for the program, giving them a potentially false qualifying answer, or derailing them from the next steps in their benefits journey.

In addition to placing a burden on a person to answer complex questions to get basic information, most pre-screeners do not work well. All six pre-screening tools we reviewed had issues with loading, form functionality, and page rendering. Some of the issues were so severe that they crashed completely or lost data.

Instead of using pre-screeners, give people eligibility information in a format that is easy to read and scan so that they can know the rules right away. People can use that basic information to do more in-depth calculations if they want to.

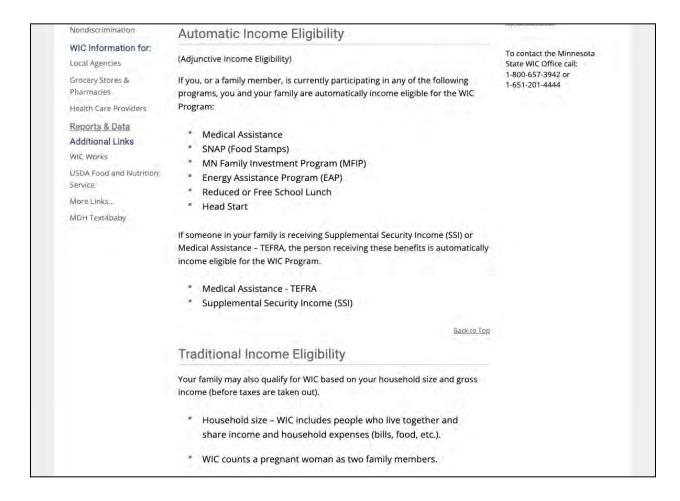


Figure 11: Screenshot (August 2022) of Minnesota's WIC eligibility page with the automatic income eligibility information focused on the top of the screenshot.

Minnesota's website has extensive information on all the programs that automatically qualify people for WIC. The page spells out acronyms and puts complex concepts like household size in plain terms. These are all available for people to scan in bulleted lists on one page.

Give people straightforward eligibility information and useful next steps. List out eligibility requirements in clear, plain terms on web pages that have contact information and next steps. Keep people on web pages that give them next steps on

how to get benefits. Direct people to useful information like WIC office phone numbers and email addresses to get customized eligibility advice.

Update the FReD. Pre-screening tools seek noble outcomes, both better understanding and faster processing for busy families, but they do not work well. If USDA wants to encourage the use of modern technical tools and online applications, it should update the Functional Requirements Document for a Model WIC Information System (FReD). Technical requirements written 15 years ago cannot capture the techniques and capabilities of modern technical development. Outside organizations, such as Nava Public Benefit Corporation, are piloting such tools and capabilities. Partnering with entities, modern developers, and users, USDA could encourage the use of modern, human-centered technologies by updating the minimum requirements for the Information Systems used by all WIC entities.

Security and Errors

Use HTTPS

Use HTTPS for all websites and pages, especially forms and information collecting pages. HTTPS is a security feature that safeguards information exchange while visiting websites. This feature prevents common attacks like URL (web address) hijacking or 3rd parties seeing information about a person's browsing history.

Most WIC websites used HTTPS, although we cited 4 that did not use HTTPS or did not set HTTPS as the default. Websites that don't use HTTPS are penalized in several ways including removal or lowered priority on search engine results, content loading issues, and potential browser blocking. These issues can prevent people from finding the official website and reduce confidence in people who do visit. Note that using HTTPS is one of many basic web security features and does not guarantee website browsing is private.

Limit personal information disclosure

Only ask for personal information when it will be collected securely and used meaningfully. Many WIC websites asked people for sensitive personal information like pregnancy status, income, and social benefit participation as part of a pre-screening, pre-application, or contact process. Pre-screening tools in particular gather large amounts of sensitive data without using that data to help people apply for the program. Even if this data is passed onto a WIC office, in almost all cases

people will need to provide or verify this information again in person at a WIC office, duplicating time and work.

Have more in-depth income discussions person-to-person instead of forcing people to guess or estimate. If a person is submitting personal information online, make sure that data goes to a person or office that can help the potential participant. Avoid forcing people to fill out complex forms and disclose information about themselves to get basic program information.

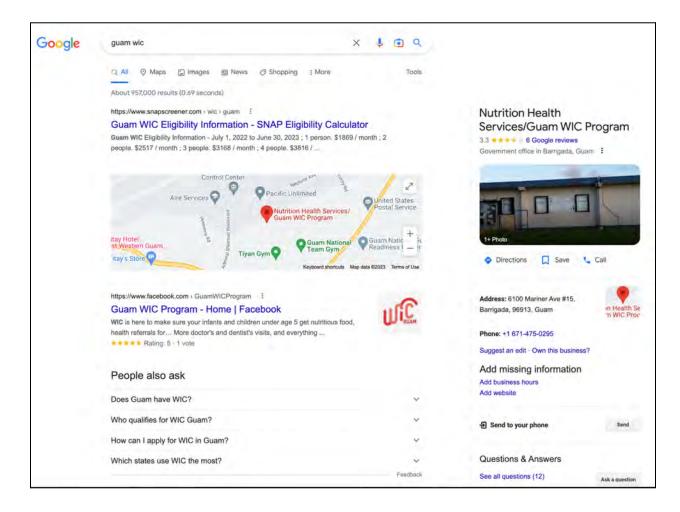


Figure 12: Screenshot (August 2022) of the Google search results page for "guam wic" with the first two results, location map, commonly asked questions, and information sidebar displayed.

Search results for Guam's WIC web presence. Guam has a <u>government-controlled WIC</u> <u>website</u>, but did not have HTTPS enabled as the default. This caused search engines like Google to not list the website in search results, instead pointing people to third party websites.

Fix functional errors

Test pages and tools for server timeouts, page crashes, slow load times, and other functional errors and fix as needed. During our content review, we observed several issues with basic page functionality impacting multiple WIC entities. These types of functional issues prevent people from accessing the program online and undermine their trust in using the site (and faith in the entity operating it), especially when the site asks for detailed personal information.

Issues included slow page load times, unexpected server errors, incomplete content loading, and page rendering issues. These issues were mostly observed on mobile websites or when attempting to access online portals, forms, and pre-screening tools. Conduct user Acceptance Testing (UATs), Technical Quality Assurance tests (QAs) and other technical exercises on all WIC pages and digital tools to help identify and eliminate bugs.

Remove old tools

Take down unmaintained tools and resources. Legacy web pages, tools, and forms are often forgotten about but remain accessible to the public, leading people to incorrect information, insecure forms and applications, or deceptive dead ends. These deprecated tools are often still discoverable via search engines, third party links, and other web properties outside the entity's control.

Perform a content audit, noting outdated pages or tools that are no longer maintained. Take down these pages, turn off unused aspects and features, and put web address redirects in place where needed. Ensure that income tables are accurate. Request search engines reindex websites after major changes to update search engine results.

Accessibility

Review materials for WCAG Double A level compliance

One in four people in the United States has a disability of some kind, covering a wide range of sensory, cognitive, and physical differences. Accessibility helps a large part of the population navigate and get the services they need in a way that works for them.

Beyond specific disabilities, accessibility helps everyone. High contrast content means that content is visible in very bright or very dark conditions. Clear, large text is easier to read, especially on small screens. Subtitles help people access video content when listening to audio is not an option. The ability to access materials in multiple formats allows people to listen while they do other things, read on their preferred device, and save their progress in a life full of distractions.

Use automated tools for basic accessibility review. Several machine review tools are available on the market to use for accessibility review. Most of these will cover the basics and focus on WCAG guidelines but are limited in their scope. Our review covered WCAG single A level compliance, but after reviewing our research results with accessibility specialists, we now recommend WCAG double A level compliance at a minimum.



Figure 13: Screenshot (August 2022) of Arkansas's WIC web page from a desktop computer.

Arkansas's WIC web page had good color contrast, text size, and uses headings to organize content. Red text can sometimes be an indicator of a warning or alert, but here is easily understandable as the page title.

Include disabled people in website reviews

Engage people with disabilities in testing and review through usability testing, program evaluation, and community outreach. Each person brings important context with them when they participate in content reviews, giving WIC entities better insights to what will work for a variety of ability differences.

Think beyond visual issues

Accessibility considerations include people with a variety of disabilities and cognitive differences, not just visual perception. Although basics like page tagging, structure, contrast, and font size are extremely important, making pages accessible goes beyond the WCAG rules. For example, location and size of mobile website elements such as buttons can help someone who has the use of a single limb, either from a physical disability or because their other arm is holding an infant.

Content Strategy

Write for everyone

Use plain language. Many WIC websites used complex language, special terms, or program-specific jargon on their pages. Most people scan web pages rather than read them word-for-word. Complex language makes pages hard to understand, forcing people to re-read information several times or guess about its meaning. Always use a simpler word when available. Write in an active voice using personal pronouns. Use short sentences and paragraphs. If a complex term is needed, clarify with a plain language explanation.

Simple word use helps people who do not speak English well. Many WIC entities offer machine translations on their websites. These automatic translations will be more accurate if the web page uses plain language and simple grammar. Many non-English speaking families rely on young household members to translate on behalf of adults. Plain language helps children read and understand information so they can translate for their families.

Spell out acronyms and use familiar program names. WIC entities often used acronyms or abbreviations for state agencies or programs. Spell acronyms out when they first appear on a page or in a document. Use common names after spelling out official program names and abbreviations.

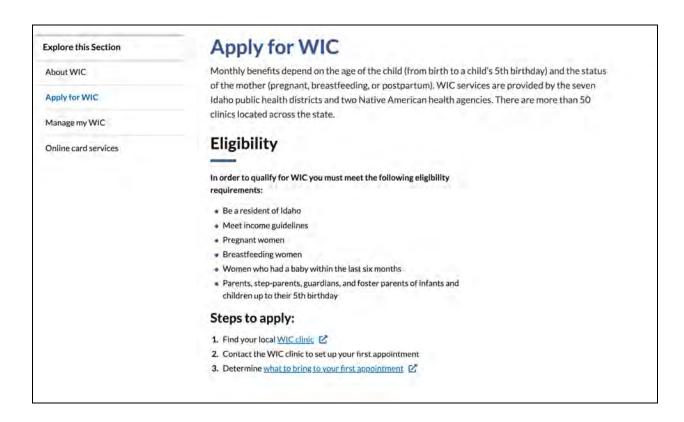


Figure 14: Screenshot (August 2022) of Idaho's Apply for WIC web page with eligibility information listed in the middle of the image.

Idaho's eligibility information does a good job of putting eligibility requirements in plain terms, including using the term "postpartum" and then later defining it as "Women who had a baby within the last six months." This page could be improved by including information about qualifying programs like SNAP and Medicaid.

Use inclusive language. WIC entities focused on women, using gendered language and terms. Even the common abbreviation for the program, Women, Infants, and Children, implies that WIC is only for women. Any caregiver can get WIC for their qualified child or their pregnant household member. Use gender neutral language whenever possible to make the information inclusive of other caregivers.

Kids cannot use or administer the benefits themselves so they are generally not thought of as benefit holders. Encourage people to apply on behalf of their children using language centered around the person who will be applying for and controlling the benefits. Clearly state that other caregivers like dads, foster parents, or other guardians can get WIC for their kids under 5.

Provide English language alternatives. Many WIC entities provided limited translation services, most of which were machine translations like Google Translate. Machine translations are imperfect at best, producing hard to read results with grammatical errors and poor word choices. Although plain language can help facilitate better automatic translations, providing services and materials in commonly spoken languages is best. This is especially important for tables and images that may not be included in automatic translation, which often contain key eligibility information.

Providing these services does not necessarily mean investing in expensive text translation of materials or pages. Videos, radio ads, or even highlighting which offices speak which languages can help non-native English speakers navigate services with more confidence.

Consolidate content

Consolidate WIC information in one place: Many WIC entities had a dedicated WIC website in addition to one or more state pages which also contained WIC information. WIC websites often had a very different look and feel from the entity's main website. Depending on where a person lands first, these pages can create a confusing browsing experience. Cross-linking between separate websites with different pieces of information in different places that look completely different makes it hard for people to find and trust information.

Maintaining multiple web presences also increases the burden on WIC entities, doubling the work and increasing the likelihood of errors and out of sync information. This is even more problematic when linking to an external site outside of an entity's control. Put all WIC information in one place, either a microsite or a set of pages on the official entity main website. Link only to that one place.

Combine web pages with similar information. Many WIC entities had multiple short pages with small amounts of content on each page. This page style fragments important information in multiple places, causing people to go to many places and spend longer finding the information they need. Multiple places with similar information increase the chances of duplicate or conflicting information and doubles the work to keep this information correct. Combine similar content on pages. Consider all the information a person needs to take a next step after reading.

Set expectations

Tell people what WIC is with basic program information. Do not assume people know what WIC is even if they are participating in other programs or services. Clearly state basic information about the program to avoid confusing potential participants.

List all eligibility requirements. WIC eligibility is not straightforward and uses a unique set of criteria that overlap with but do not match other social programs. Most WIC entities did not list all the ways a person can be eligible for WIC, such as highlighting only mothers as caregivers. Include all the program requirements on eligibility pages. Be as comprehensive as possible, highlighting things like food stamp participation that automatically satisfies a family's income requirements.

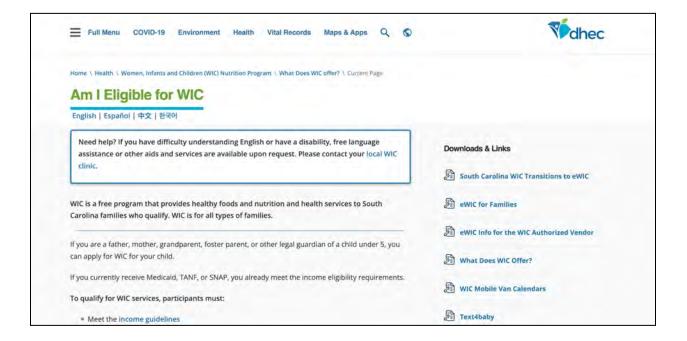


Figure 15: Screenshot (August 2022) of South Carolina's Am I Eligible for WIC web page with the top call-out box displayed along with other information.

South Carolina's WIC eligibility page told people with disabilities and people who have trouble understanding English how to get help and what to do next. This page also did a good job of highlighting caregivers other than mothers and helped set expectations with potential participants by letting them know WIC is free.

Review content regularly

Take down outdated files and check links regularly. Although PDFs are easy to upload and host online, they can also be easy to lose track of. Many websites don't take down old files which can show up in search engine results, misleading people or giving them outdated information.

Automate what you can. Whenever possible, pull data from a reliable source, such as USDA and automate that process as much as possible. An Application Programming Interface (API) is technology that lets technical systems share and use common information. For example, an API might be able to index the USDA's site for important program data like updated income guidelines, removing the need to manually update sites.

Use banners and alerts sparingly. Too many banners, alerts, and warnings can easily overwhelm people, especially when the alert information doesn't seem relevant to the page the person is on. Alerts often don't expire when the information may no longer be relevant, making pages look outdated. Consolidate emergency information into a single alert that points to a page with more information. Only add alerts where that information is relevant.

Mobile-friendly Design

Format pages for small screens. The most common error trend observed across all WIC entities was issues with mobile display and formatting. These included side scrolling tables, improper content order, unformatted graphics, and inconsistent menus. Ensure information stacks in a way that makes sense on small screens. Fix tables, icons, and graphics so that they scale properly, and pages scroll smoothly.

Make content easy to scan and scroll. Most people do not read all the content on a web page, instead they scroll or scan to find the piece of information they need. Many WIC entities presented information in long paragraphs or large blocks of text which are harder to read, especially on smaller screens. Break these into shorter sentences or lists for easier scanning. Use heading tags to break up page content in a logical order, allowing people to scroll to specific content.

Offer simple explanations of dense graphics like charts, tables, and data-focused images. Some WIC entities provide critical eligibility information like income rates in graphics. Mobile devices will reformat images to fit screen sizes, making some

images very small and hard to read. Include both ALT tags and image descriptions to help people access this content more easily.

Include critical PDF information on web pages instead. PDFs are hard to read on small screens. Brochures, booklets, and other PDFs, especially those designed for printed documents, may be formatted improperly for web viewing. Spell out the most important information in text on the relevant web pages. Avoid posting PDFs whenever possible and, when a PDF is necessary, link to the PDF from explanatory page text.

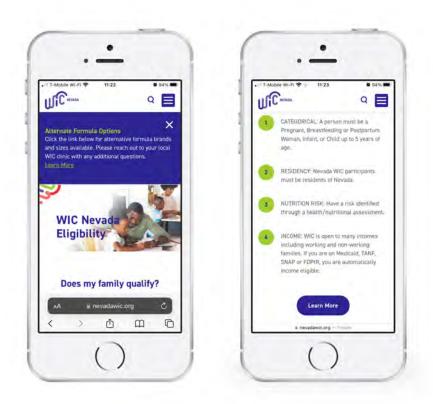


Figure 16: Screenshots (August 2022) of Nevada's WIC eligibility web page displayed on an iPhone SE for scale. The image on the left is the top of the eligibility page. The image on the right is a numbered list of eligibility information with a learn more button.

Nevada's WIC eligibility web page rendered well on mobile devices, has a readable alert banner that draws attention to it but is dismissible and doesn't limit access to other content on the page. The buttons are big enough to easily tap and the text is big enough to read on small screens. This page could be improved with plain language explanations of the eligibility criteria.

Conclusion

WIC entities provide benefits across the United States, serving diverse communities with different needs, wants, access, and abilities. Eligibility website information is only one aspect of service delivery. Depending on the population an entity serves, it may not be an important one. A great website does not equal great WIC benefits delivery or participant satisfaction.

Our content review was conducted in July and August of 2022 during the COVID-19 national state of emergency as well as a major baby formal recall and shortage. These emergencies highlight how priorities continue to shift in response to ongoing COVID-19 impacts like supply chain disruptions.

Considering emergencies and shifting priorities, every WIC entity benefits from a simple web presence with basic program information including a plain language list of eligibility requirements. WIC web pages are a way for participants to find information, get critical program updates, or take the next step on their benefits journey.

Entity-run web pages are often used by other websites like Google search results and popular apps like Google Maps to populate data and help people navigate through their phone GPS. A secure, entity-run web presence creates a trustworthy source of information, preventing people from visiting third party websites that may have inaccurate or outdated information.

WIC entities have a mix of great information, helpful processes, and areas of improvement on their websites. Many of the recommendations in this report are fixable now while others may take more time, effort, and coordination across departments. WIC entities know their communities and their urgent needs and can prioritize any of our recommendations depending on what people need most.

For comments or questions about this report, including entity-specific findings, please reach out to wic.project@servicedesigncollective.com.

Acknowledgements

Thank you to the <u>National WIC Association</u> for their research in this space and assistance in supporting our plain language training to WIC entities. Without their background, in-depth statistics, and reporting we would not have a foundation for this report.

Thank you to Judy Brewer and the <u>Partnership for Public Service</u> for their expertise on web accessibility tools and standards.

Thank you to <u>Nava PBC</u> for partnership and research support as well as outreach to WIC entities. Service Design Collective partnered with Nava to create and host a plain language and readability training for WIC providers.

Thank you to the <u>Center on Budget and Policy Priorities</u> and Zoë Neuberger for their foundational research in this space.

Thank you to <u>Arabella Advisors</u> for their generous funding and support of this work.

Addendum

This research was conducted in 2022. Since then, some WIC websites have changed, including new website launches, redesigns, error corrections, and/or updating HTTPS usage. As content continues to change, we hope these simple guidelines will benefit the WIC community.

Appendix A: Definitions

The following list contains the definitions for terms, language, and rules that guided our evaluation.

Applications and pre-applications

Applications and pre-applications are a variety of questionnaires or forms that collect data to begin applying for WIC benefits. Application and pre-application are used interchangeably by WIC entities to refer to these types of forms. Applications and pre-applications come in a variety of formats including online portal registration, simple contact forms, and longer intake forms. Many applications include one or more screening questions but use that data to register for an online service or initiate contact with a WIC program.

Content

Content is anything a technology platform presents to an end user when that user is interacting with that technology. Examples of content include performance elements like load time, error messages and error states, written words, page formatting, graphics, images, videos, sound, interactive elements, files, and other digital assets.

Content Audit

A content audit is a review and accounting of all the content of a given piece of technology. Our content audit specifically focused on web assets like web pages, PDFs, and online forms related to WIC eligibility. Content audits can also review technology products for system status, system performance, and errors.

Eligibility

We defined eligibility materials as web pages, files, forms and other digital assets that told people what criteria they needed to meet to be eligible for WIC benefits. Included in this definition are pre-screening tools, digital forms, or quizzes that ask people a series of eligibility questions. After answering questions about themselves, potential WIC participants are told if they qualify for WIC or not based on their answers. Pre-screening tools are an example of a specific digital asset that gives people information about what criteria they need to meet to be eligible for WIC benefits.

45

Heuristic evaluation

A heuristic evaluation is a type of usability review used to identify potential issues in the user interface (UI) design, system performance, and format of a technology product (examples: software, websites, kiosks, and operating systems). Heuristic evaluations use a set of recognized usability principles or "heuristics" as criteria for scoring. These criteria help determine how easy or difficult the technology product is to use and if the technology is designed in a way that supports its successful use.

Pre-screeners

Pre-screeners are quizzes, forms, or questionnaires that ask people a series of questions and then give them an eligibility result based on their answers.

Pre-screeners are different from things like portal registrations or contact forms because they do not keep the information they collect or pass the information on to a WIC office.

WIC

The Special Supplemental Nutrition Program for Women, Infants, and Children is known more commonly by its abbreviation WIC. WIC is short for Women, Infants, and Children. We use "WIC" throughout the report to refer to this program at all government levels.

WIC entities

We use the terms "WIC entity" or "WIC entities" through our report. A WIC entity is a government institution that is authorized to administer WIC benefits by the USDA. In 2022, the United States had 89 total WIC entities comprising 50 US states, 5 US territories, 33 Indian Tribal Organizations, and the District of Columbia. WIC entities are referred to as "states" or "state agencies" on the USDA website or in other official contexts. WIC entities provide services through 1,900 local agencies and 10,000 clinic sites.

Appendix B: Technology and timeline

Our data collection

We evaluated all materials, websites, and pre-screening tools in July and August of 2022. Our results represent observations made during that time period and may not reflect the current state of the systems reviewed or current content.

Our evaluation technology

We conducted our large screen reviews on a MacBook Pro running iOS 13 using the Google Chrome browser. Our mobile reviews were done using an iPhone SE running iOS 15 mobile with the native Safari browser. We used home Wi-Fi internet connections with variable speed rates of 25 - 500 Megabits per second. Content, websites, and materials may appear or load differently depending on operating systems.

Appendix C: Attachments

- WIC Plain Language Training Session Slide Deck PDF
- WIC Plain Language Training Session Video Recording YouTube

Appendix D: References and reports

Pre-screeners

- USDA WIC pre-screener
- USDA Deprecated pre-screener
- Benefits.gov WIC pre-screener
- California pre-screener
- Michigan pre-screener
- New Mexico pre-screener
- South Dakota pre-screener

References and data sources

- Flesch-Kincaid Readability Tests
- HHS Poverty Guidelines
- Pew Research Center: Internet/Broadband Fact Sheet

- <u>US Census: Survey of Income and Program Participation (SIPP) Detailed</u>
 <u>Program Receipt Tables: 2020</u>
- US Census: How the Census Bureau Measures Poverty
- US Census: Language Spoken at Home
- USDA: About the WIC program

Reports

- <u>Center for Budget Policy and Priorities: Streamlining and Modernizing WIC</u>
 Enrollment
- National WIC Association: The State of WIC 2021

Appendix E: Resources

Design

- 10 Usability Heuristics for User Interface Design: Nielsen/Norman Group
- A Quick Guide to Inclusive Design: U.S. Digital Service
- Banner Blindness Revisited: Users Dodge Ads on Mobile and Desktop: Nielsen/Norman Group
- How Little Do Users Read?: Nielsen/Norman Group
- U. S. Web Design System (USWDS)

Plain language

- Plainlanguage.gov
- Plainlanguage.gov: Design for reading
- Public Law 111 274 Plain Writing Act of 2010
- A Plain English Handbook: U. S. Securities and Exchange Commission

Accessibility

- Contrast and Color Accessibility: WebAIM
- Evaluating Web Accessibility Overview: W3C
- How to Meet WCAG (Quick Reference): W3C
- The World Wide Web Consortium (W3C) that sets ADA standards and best practices for online tools and technology: W3C
- WAVE Web Accessibility Tool
- Typefaces and Fonts: WebAIM