



American Society for Nutrition
Excellence in Nutrition Research and Practice

December 8, 2021

Re: Response to RFI: Center for WIC Modernization and Delivery

To Whom it May Concern:

The American Society for Nutrition (ASN) appreciates the opportunity to provide information relevant to the U.S. Department of Agriculture Food and Nutrition Services (USDA FNS) plan to create a Center for WIC Modernization and Delivery. ASN applauds FNS for these efforts to modernize the Special Supplement Program for Women, Infants and Children (WIC) and recognizes the tremendous importance of this center to improve the process and experience for WIC participants.

Below ASN provides our input on how the WIC process and experience may be improved through the Center for WIC Modernization and Delivery in response to select questions provided by USDA. ASN is a not-for-profit, professional scientific society dedicated to bringing together the world's top researchers to advance the science, education, and practice of nutrition. ASN has more than 8,000 members around the world, working throughout government, clinical practice, academia, and industry, to conduct research to achieve the ASN vision of "A Healthier World Through Evidence-Based Nutrition".

Thank you for your consideration of ASN's comments. Please feel free to contact Sarah Ohlhorst, MS, RD, ASN Science Policy Officer, at 301-219-9890 or sohlhorst@nutrition.org with any questions or requests for additional information.

Sincerely,

Paul M. Coates, Ph.D.
2021-2022, American Society for Nutrition President

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

ASN applauds the Center's efforts to support all activities that modernize and enhance online WIC Administration. This includes remote WIC enrollment through:

- telephone or video certifications;**
- remote benefit issuance;**
- online document transfer to increase enrollment and reduce disparities in program delivery;**
- increased investment in WIC technologies and management information systems;**
- expand opportunities to transact benefits electronically at farmers markets; and,**
- offer online ordering and benefit transactions to simplify and improve the shopping experience and to address disparities in food access.**

The Center should be able to fund research that will provide information to improve new technology solutions and process changes. For example, research on the following topics is needed:

- Reasons for recent declines in WIC participation and recommend solutions.**
- Reasons for notable contrasts in participation between age groups, such as 1-year-olds versus 4-year-olds and recommend solutions.**
- Study program participation and retention and program satisfaction.**
- Study and make recommendations for consolidating applications/certifications across child nutrition programs and SNAP to reduce the burden of a separate application process for each program and to ensure that participants have access to all programs for which the family is eligible. It is also important to research the impact of such changes on food assistance program participation rates.**

2. How should the Center evaluate WIC State agency needs and prioritize projects?
3. 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?

ASN supports an extension of the certification period to 2 years with remote WIC enrollment through telephone or video certifications, remote benefit issuance, online document transfer, and other investments in WIC technologies and management information systems to improve the participant journey through WIC. Increasing enrollment and retention by certifying people for program benefits in ways that are participant-centered and reduce disparities in program delivery will greatly improve access and the participant journey.

The Center should assist State and local WIC agencies in leveraging their data by offering ways to improve data collection which will better inform WIC agencies for new

technology solutions and process changes, including providing for an expansion of current data collection to assess WIC redemption patterns. The Center may consider how to link Medicaid and State WIC agency data, since some Medicaid programs also provide free dietary supplements for enrollees during pregnancy and lactation.

WIC food packages should be updated to adhere to current scientific evidence-based nutrition standards, including the *Dietary Guidelines for Americans*, and adapted for the diverse dietary patterns, practices, and food preferences of the communities served. This may involve support for a new National Academies of Sciences, Engineering, and Medicine study to translate the most recent *Dietary Guidelines* into appropriate WIC food packages.

Increasing the value of WIC food packages, particularly the cash value benefit for fruits and vegetables would allow maximum flexibility for participants' diverse cultural preferences and, in turn, may improve participation.

4. 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 issue that impact the customer experience?

The Center could support research to compile lists of best practices and potential solutions that positively affect outcomes. The Center could also enlist the help of other USDA branches such as the Economic Research Service for such reviews and reporting.

5. How would you define and measure success for the Center?
6. What risks do you foresee in establishing a Center to support WIC State agencies? How would you mitigate those risks?
7. Do you have any other feedback or suggestions on this Center-based approach? Please describe in detail.