

Administrative Conference of the United States, 1120 20th Street NW, Suite 706 South, Washington, DC 20036

RE: Identifying and Reducing Burdens in Administrative Processes

Dear Colleagues,

As a pediatrician and child health researcher at PolicyLab at Children's Hospital of Philadelphia, I recognize the critical importance of government benefit programs, including Medicaid, the Supplemental Nutrition Assistance Program (SNAP), and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), for children and families living in poverty. In this comment, I offer my perspective on strategies for reducing administrative burdens in the WIC program specifically, informed by my clinical experience caring for WIC beneficiaries and research, including studies conducted by our team of investigators at PolicyLab.

As you know, the WIC program is a key source of nutrition assistance and nutrition education for pregnant and postpartum individuals and children under age 5 who are living in poverty. WIC has proven health benefits, including decreased rates low birthweight and preterm birth, decreased food insecurity, and improved nutrition, but only about half of all eligible families receive WIC benefits.¹ In contrast, more than 80% of eligible individuals receive SNAP benefits,² and this difference in uptake is partially a reflection of differences in the administrative burdens associated with these two programs.

Our research shows that administrative burdens – specifically the stigma and inconvenience associated with accessing and redeeming WIC benefits – can serve as a significant barrier to WIC participation. In one recent study, we analyzed monthly state-level data on WIC participation and found that the transition from paper WIC vouchers to less stigmatizing and more convenient WIC EBT cards was associated with a 7.8% increase in WIC participation.³

During the COVID-19 pandemic and Public Health Emergency, the WIC program adopted several flexibilities that made it more convenient for families to access benefits. Most notably, the WIC physical presence and remote benefits issuance waivers allowed families to complete WIC certification, reload their WIC EBT cards, and receive WIC nutrition education remotely, without having to travel to their local WIC office. In qualitative studies and in my clinical practice, I have heard from many families that having to travel to a local WIC office with their eligible child or children can be burdensome and inconvenient, sometimes requiring families to miss work and forego income. Offering families the option of remote certification and remote benefits reloading helps ensure that they can access WIC benefits and benefit from WIC nutrition education in the way that is most convenient and least burdensome for them.

Our research suggests that WIC should continue to offer remote certification and remote benefit issuance as an option even after the end of the COVID-19 Public Health Emergency. In another recent study, we found that WIC participation during the pandemic was 14% lower in “Offline Electronic Benefits Transfer (EBT)” states, where beneficiaries had to reload their EBT cards in person, as compared to “Online EBT” states, where beneficiaries could reload their cards remotely.⁴ Maintaining the ability for states to conduct remote certification and remote benefit issuance and reloading will be critical to sustaining gains in program participation seen during the pandemic, and ensuring families with barriers to transportation can continue to receive and redeem WIC benefits.

We encourage the WIC program to continue their support of digital tools like shopping apps, which could further reduce administrative burdens in the WIC shopping experience. With support from the United States Department of Agriculture (USDA), many state WIC programs across the country are innovating to modernize WIC and make beneficiaries' experience more user-centered. Many states utilize apps which can allow beneficiaries to check their balance, find recipes, determine eligible products, and locate WIC offices and vendors. Early research suggests that these apps may lead to greater benefits redemption rates, in part by reducing the burdens associated with identifying WIC-eligible products in a store.⁵

Some state WIC programs also offer virtual nutrition education through their apps, which reduces administrative burdens by allowing participants to complete the courses at convenient times and without having to travel. Along with their support of WIC apps, we appreciate USDA's support of online shopping pilots, which could increase WIC redemption by completely eliminating the stigma and inconvenience associated with finding and purchasing WIC-approved products in stores.^{6,7}

In summary, reducing administrative burdens in the WIC program is critical to supporting participation and ensuring that all eligible low-income children and pregnant and postpartum individuals can access the nutrition support and nutrition education they need through this program. By continuing to support remote certification and remote benefits reloading, and by supporting newer innovations like WIC apps, remote nutrition education, and WIC online shopping, we believe the USDA is poised to significantly reduce administrative burdens and improve the user experience for WIC beneficiaries.

Thank you for the opportunity to comment on ways to identify and reduce unnecessary burdens that members of the public face when they engage with the WIC program. If I can be a resource in any way as this important work continues, please contact me at vasana@chop.edu.

Sincerely,

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