



U.S. DEPARTMENT OF AGRICULTURE

Third National Survey of WIC Participants (NSWP-III)

BRIEF REPORT 1: WIC STATE AGENCY POLICIES AND PRACTICES



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ABSTRACT

Background: The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) is a key part of the nation's public health infrastructure, providing nutritious supplemental foods, nutrition education, breastfeeding support, and referrals to health and social service programs for low-income pregnant and postpartum women, infants, and children up to age 5 who are at nutritional risk. The National Survey of WIC Participants (NSWP) series is designed to provide national estimates of WIC participants, State agencies' (SAs) and local agencies' (LAs) characteristics, and improper payments resulting from participant certification errors in WIC. NSWP is conducted approximately every 10 years. This brief is part of a series of 10 briefs that describe findings from the NSWP-III study, which collected data in 2019.

Objective: One component of the current study (NSWP-III) is to provide information on SA policies and operations, including findings on WIC SA income eligibility policies, requirements and guidance for the certification process, policies regarding proxies, and record-keeping systems.

Methods: Between June to October 2019, data were collected via a web-based survey distributed to all 89 WIC SA directors and another web survey sent to 890 LAs. For the SA survey, a total of 82 SAs responded to the survey. For the LA survey, a total of 714 LAs responded to the survey, and data were weighted ($n = 1,979$) to produce nationally-representative estimates.

Findings:

- While 37.0 percent of SAs used only adjunctive income eligibility with Supplemental Nutrition Assistance Program (SNAP), Medicaid, and Temporary Assistance for Needy Families (TANF), the other 67.0 percent also confirmed income by participation in at least one other State-administered program.
- More than half of SAs (56.1 percent) did not give additional guidelines to LAs to determine the family economic unit above and beyond Federal requirements. Of the 43.9 percent of SAs providing additional guidance, more than half of SAs (58.3 percent) indicated providing additional guidance and examples to help the LA determine the family economic unit for specific situations, such as foster children, service members, and joint custody arrangements.
- SAs indicated that they mostly (58.3 percent of SAs and higher) confirm eligibility through award/participation letters across the various adjunctive and automatic income eligibility programs. This finding aligns with Federal guidelines that instruct SAs to accept award/participation letters because electronic lookups are not available in every SA. However, in the case of Medicaid, the most popular method was an electronic lookup (68.3 percent) which is available in States that have access to the Medicaid database.
- The majority of SAs (76.8 percent) reported they could not match records from other programs' systems, such as TANF or Medicaid, through their WIC database to facilitate record-keeping or certification. The remaining SAs were connected to other systems (17.1 percent) or unsure if they were connected to other systems (6.1 percent). Of SAs that connected to other systems, the majority reported matching with Medicaid's system (78.6 percent).

Conclusion: The findings suggest that SAs could benefit from technology enhancements to their record-keeping systems. Specifically, future research could explore barriers to the accessibility and use of technology that enables connecting to adjunctive/automatic income eligibility programs' systems.

INTRODUCTION

Background

The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) is a key part of the nation's public health infrastructure, providing nutritious supplemental foods, nutrition education, breastfeeding support, and referrals to health and social service programs for low-income pregnant and postpartum women, infants, and children up to age 5 who are at nutritional risk.

The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) administers WIC by providing Federal grants to 89 State agencies (SAs), including 50 States and the District of Columbia; 33 Indian Tribal Organizations (ITOs); and the 5 U.S. Territories of American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands. In 2019, the average monthly WIC participation was 6.4 million participants nationwide.¹

SAs are responsible for the effective and efficient administration of WIC in accordance with Federal regulations.² SAs have authority in how they implement WIC requirements, as outlined in WIC regulations, including the management and operations of the program. SAs maintain direct agreements with local agencies (LAs). LAs are a public or private nonprofit health or human service agency that provides health services in accordance with WIC regulations.³ In addition, SAs have written agreements in place to guide their LAs on all aspects of program operations, including allocating funds, extending technical assistance, and providing oversight for LA compliance with Federal regulations and SA policies and procedures.

The National Survey of WIC Participants (NSWP) series is designed to provide information on the characteristics of nationally representative samples of WIC participants, SAs, and LAs, and to produce estimates of improper payments resulting from participant certification errors in WIC. The first NSWP was conducted in 1998, NSWP-II was conducted in 2009, and the current study, NSWP-III, was conducted in 2019.^{4,5}

¹ U.S. Department of Agriculture, Food and Nutrition Service. (2020). *WIC Program: National level annual summary*. <https://fns-prod.azureedge.net/sites/default/files/resource-files/wisummary-6.pdf>

² Government Publishing Office. 2020. *Electronic Code of Federal Regulations 7 CFR Part 246*. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

³ Government Publishing Office. (2020). *Electronic Code of Federal Regulations 7 CFR Part 246.2*. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

⁴ U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. (2001). *National Survey of WIC Participants: Final Report*. Alexandria, VA.

⁵ U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. (2012). *National Survey of WIC Participants II. Technical report*. Alexandria, VA.

Research Objective and Questions

One objective of NSWP-III is to provide information on SA certification-related policies and operations, which is the focus of Report 1.⁶ Specifically, this report addresses the following research questions:

INCOME ELIGIBILITY

- What programs do SAs use to establish automatic income eligibility for WIC?
- What are the income benchmarks (Income Eligibility Guidelines) for determining WIC eligibility in each SA?
- What criteria are used to determine the family/economic unit for WIC eligibility determination?
- Does Basic Allowance for Housing (BAH) or Outside of the Continental United States Cost of Living Allowance (OCONUS COLA) count toward income eligibility determination?⁷

REQUIREMENTS AND GUIDANCE FOR WIC CERTIFICATION

- What forms of proof of participation (types of documentation of participation) in such programs are required for WIC automatic income eligibility determination?
- What are the SA's policies regarding documenting the residency of a WIC applicant?
- How many and which SAs are accepting incomplete Verification of Certification (VOC) cards?
- What are the policies regarding certification periods by categorical group?

POLICIES REGARDING PROXIES

- What are the policies regarding accepted activities for proxies?

RECORD-KEEPING SYSTEMS

- What record-keeping systems do SAs have in place for participant termination and denial of services?
- Are the WIC systems (MIS) connected to other programs' systems, such as TANF or Medicaid, to facilitate record-keeping or certification?
- What technology and software are in use for certification and record-keeping?

Report Organization

The following sections of this brief report detail the findings related to the research questions referenced above. The report concludes with a summary of key findings and discussion of the study limitations and recommendations for future research. The report also references appendices that include technical details of the survey methodology, a copy of the surveys, and the analytic tables.

⁶ Please visit the FNS website at <https://www.fns.usda.gov/research-analysis> to access the other NSWP-III brief reports and the prior NSWP studies.

⁷ The study research questions only specified BAH and OCONUS COLA; however, the SA survey also collected information on Overseas Housing Allowance (OHA) and Family Separation Housing (FSH). The findings related to these four income exclusions are presented in this brief report. Please note that there are other income exclusions allowed per the WIC regulations 246.7(d)(2)(iv) that were not included in this study.

STUDY METHODOLOGY

Source of Data

The findings in this brief are based on data collected from two surveys during the summer and fall of 2019. Table 1 lists the surveys fielded and associated operational details. For additional details, please see Appendix A.

Table 1. NSWP-III Survey Summary

Survey	Type of Data Collection	Mode of Data Collection	Estimated Length of Survey	Data Collection Period	Sample Size	Number of Completes	Response Rate ^a
SA Survey	Census	Web survey	1-hour	June 3, 2019–October 11, 2019	89	82	92.1%
LA Survey	National sample ^b	Web survey	1-hour	June 3, 2019–October 11, 2019	862 ^c	714	82.8%

^a Response rate equals the number of completed cases divided by the sum of the number of completed cases, number of refusal cases, and nonrespondents.

^b The 2017 WIC Local Agency Directory served as the sampling frame for the LA Survey and represented the population of LAs for weighting. This directory, which is maintained by FNS, includes all WIC LAs by SA.

^c Some LAs were found to be no longer eligible to participate in the study because they had closed or merged with another agency. These LAs were dropped from the sample, changing the final sample size to 862 from an initial sample of 890.

Survey Content

The SA and LA instruments were developed in collaboration with FNS and were reviewed by an independent panel that included experts in WIC policy and operations. In addition, each survey was pilot tested with nine respondents from December 2016 through February 2017 to assess the ease of comprehension (e.g., confusing wording or layout, failure to grasp concepts) and length of time to complete. Topics included in each survey are shown in Table 2.

Table 2. Topics Included in the NSWP-III Surveys

Survey	Topics Included
SA Survey (Appendix A)	- Acceptable proofs of identity and residency - Guidelines given to LAs to help them determine the family economic unit - Income determination and adjunctive/automatic income eligibility - Record-keeping practices - Manufacturer rebates - Certification period policies - Denied applicants - Retention of WIC participants
LA Survey (Appendix A)	- Acceptable proofs of identity, residency, and income - Denied applicants - Location of certification and certification staffing - Retention of WIC participants - Organization of agency (structure, clinics, sites under the LA) - Staff qualifications and participant caseloads - Range of services offered (health care, family planning, smoking cessation) and referrals - Hours of operation, location, space, and equipment onsite

Analysis

WEIGHTING

SA data. The SA data are derived from a census. Therefore, sampling adjustments, weighting, and tests of significance are not applicable.

LA data. The LA data from 718⁸ agencies were weighted to represent all 1,797 LAs that were part of the original sample frame. First, the Study Team weighted the survey data to account for differential rates of sampling. Then, the design weights were adjusted for unit nonresponse. FNS Region was used to create non-response adjustment cells. Within each cell, the adjustment factor was calculated by taking the ratio of all sampled cases to all responding cases within each FNS Region. Finally, the Study Team calculated 105 jackknife replicate weights, which accounted for the sampling design and non-sampling errors associated with the nonresponse adjustment.^{9,10}

⁸ Four partially completed surveys were also included with 714 completed surveys in the analysis.

⁹ Kott, P. S. (2001). The delete-a-group jackknife. *Journal of Official Statistics*, 17(4), 521–526.

¹⁰ Shao, J., & Wu, C. F. J. (1989). A general theory for jackknife variance estimation. *Annals of Statistics*, 17(3), 1176–1197.

SURVEY RESULTS

To understand the differences among respondents, data were analyzed according to relevant subgroups as shown in Table 3.

Table 3. Subgroups Examined for Each NSWP-III Survey

Survey	Subgroups Examined
SA Survey	▪ Type of Organization (State/District of Columbia/Territory, ITO) ▪ Number of participants served by the entire SA per month (up to 10,000; 10,000 to 74,999; 75,000 or more) ▪ Location based on the FNS Region (Mid-Atlantic, Midwest, Mountain Plains, Northeast, Southeast, Southwest, Western)
LA Survey	▪ Relationship of the LA to the parent SA (State affiliated, Local government, Non-government) ▪ The number of participants served per month by the entire agency (up to 750; 750 to 1,999; 2,000 to 4,499; 4,500 or more) ▪ LA's urbanicity (completely rural, mostly rural, completely urban)

Descriptive results are presented for all 82 SAs that responded to the survey. While a non-response bias analysis was not performed, the seven SAs that did not respond consisted of one State and six Indian Tribal Organizations (ITOs) and represented a small percentage of the total WIC population. LA Survey data are presented as weighted percentages and means. Tables with comparisons to NSWP-II (conducted in 2009) were prepared when feasible (i.e., when similar questions were asked of both studies) and can be found in Appendix E (SA data) and Appendix F (LA data).¹¹

NONRESPONSE BIAS ANALYSIS

The Office of Management and Budget (OMB) recommends nonresponse bias analysis any time the survey response rate is less than 80 percent.¹² Since an 80 percent response rate was achieved for both the surveys, the Study Team did not conduct nonresponse bias analysis.

¹¹ Comparisons cannot be made to NSWP-I and NSWP-III because NSWP-I did not include SA and LA surveys.

¹² Office of Management and Budget. (2006, September). *Office of Management and Budget standard guidelines for statistical surveys*. https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/statpolicy/standards_stat_surveys.pdf.

MAIN FINDINGS

Income Eligibility

ADJUNCTIVE AND AUTOMATIC INCOME ELIGIBILITY

WIC applicants can be determined income-eligible based on their (or certain family members'¹³) participation in other programs. SNAP, Medicaid, and TANF are programs that confer adjunctive income eligibility for WIC, and all SAs are required to accept these programs per §246.7(d)(2)(vi)(1) of the WIC regulations.

SAs have the option to establish automatic income eligibility for WIC based on participation in other State-administered programs, provided those programs have income eligibility guidelines at or below the SA's WIC income guidelines.¹⁴ Programs that may qualify a person for WIC through automatic income eligibility include, but are not limited to, the Food Distribution Program on Indian Reservations (FDPIR), Children's Health Insurance Program (CHIP), Supplemental Security Income (SSI), Low Income Home Energy Assistance Program (LIHEAP), and the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

As detailed in Exhibit 1 and Exhibit 2, 37.0 percent of SAs ($n = 30$ SAs) reported that they do not accept programs (other than SNAP, TANF, and Medicaid for adjunctive income eligibility) to establish automatic income eligibility (Appendix E, Table 13c) while the remaining 63.0 percent of SAs ($n = 52$ SAs) reported accepting at least one program. Of those, 39.0 percent of SAs accepted FDPIR and 29.3 percent accepted CHIP for automatic income eligibility (Exhibit 3). Less than 20 percent of SAs reported accepting SSI, LIHEAP, or the NSLP and the SBP.

¹³ Please note that adjunctive income eligibility through a family member only applies for TANF or a family that has a pregnant family member or an infant on Medicaid per WIC regulations 246.7(d)(2)(vi)(2).

¹⁴ U.S. Department of Agriculture, Food and Nutrition Service. (2020). "WIC Eligibility Requirements." <https://www.fns.usda.gov/wic/wic-eligibility-requirements>

Exhibit 1. WIC States' and Territories' Acceptance of Programs to Establish Automatic Income Eligibility

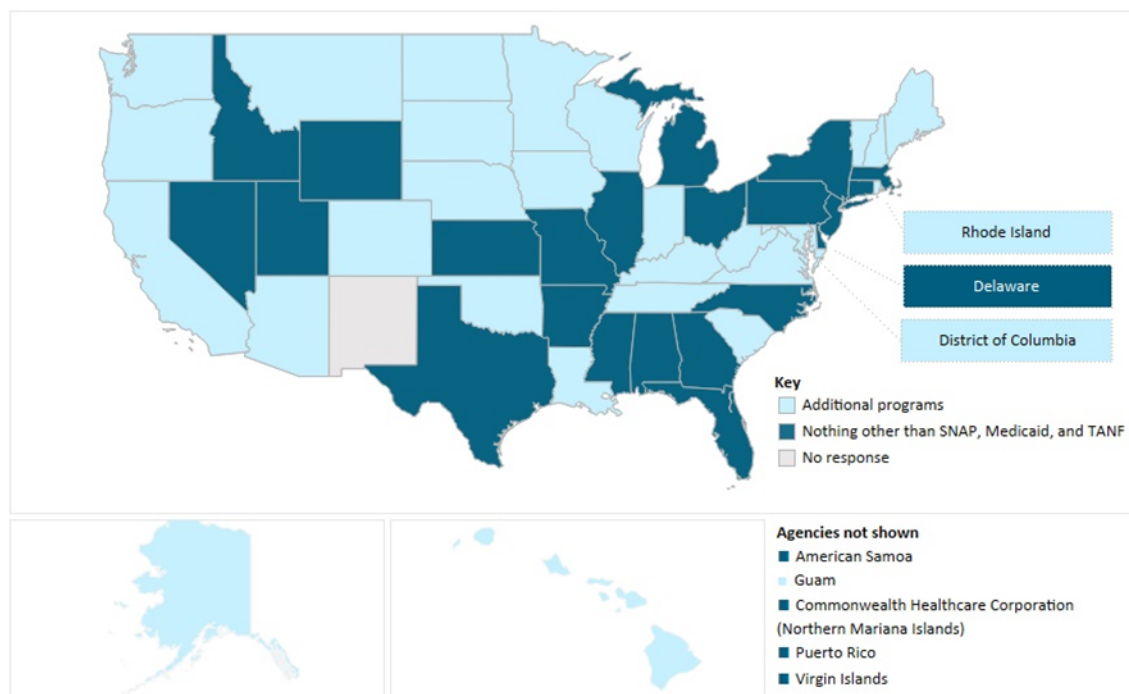
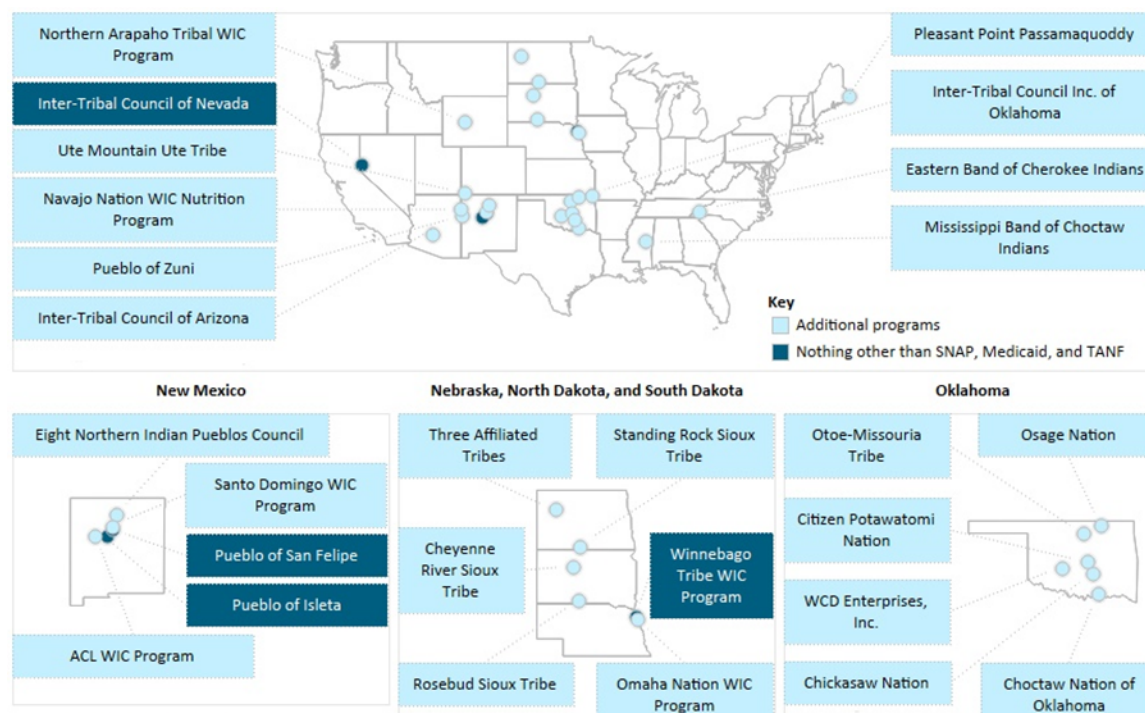


Exhibit 2. WIC ITOs' Acceptance of Programs to Establish Automatic Income Eligibility

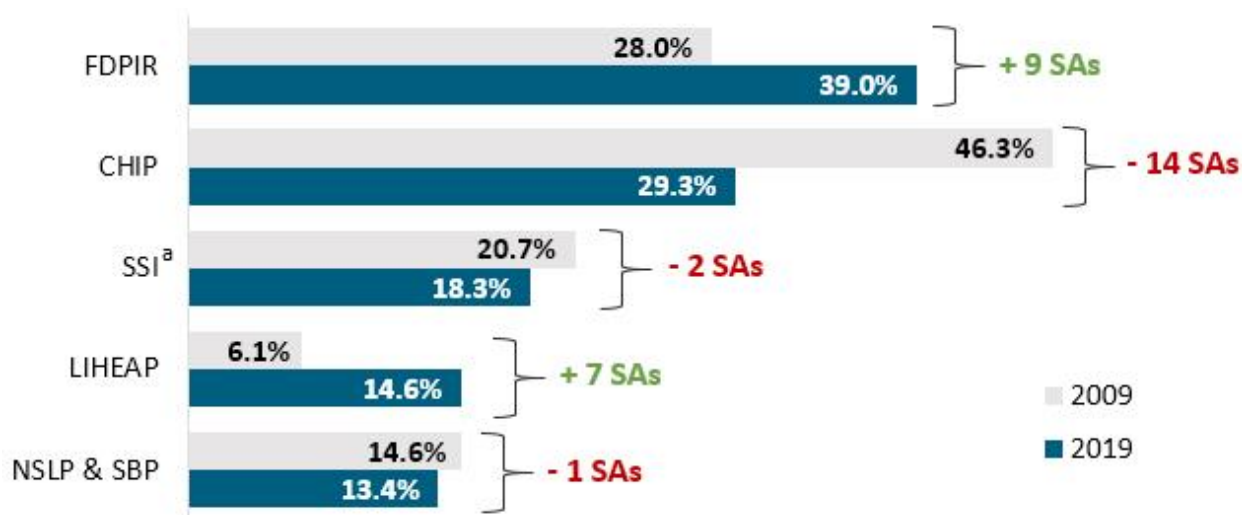


Note: Findings are based on responses from 82 SAs; total sample size = 89.

Source: Appendix E, Table 13c; NSWP-III State Agency Survey, question 12.

Between 2009 and 2019, changes were observed in the programs SAs selected to establish automatic income eligibility (Exhibit 3). More SAs (39.0 percent) accepted FDPIR in 2019 compared to 28.0 percent of SAs in 2009. In addition, the percentage of SAs accepting LIHEAP increased from 6.1 percent to 14.6 percent. Approximately 30 percent of SAs (29.3 percent) used CHIP for establishing automatic income eligibility in 2019 compared to 46.3 percent in 2009. While the NSWP-III study did not assess the reasons for the change, this decrease in using CHIP for establishing automatic income eligibility for WIC is possibly due to Medicaid expansion under the Patient Protection and Affordable Care Act of 2010.

Exhibit 3. Programs SAs Selected to Establish Automatic Income Eligibility for WIC in 2009 and 2019



^a SSI = Supplemental Security Income, which is a Federal income supplement program that helps low-income aged, blind, and disabled people.

Notes: For 2009, findings are based on the responses from 82 SAs; total sample size = 90. For 2019, findings are based on the responses from 82 SAs; total sample size = 89. SNAP, Medicaid, and TANF are programs that confer adjunctive income eligibility for WIC and were automatically selected in the survey since these programs are required to be accepted by all SAs per §246.7(d)(2)(vi)(1) of the WIC regulations. This survey question allowed the respondent to select all options that applied for automatic income eligibility; percentages may not sum to 100.

Source: Appendix E, Table 3e; NSWP-III State Agency Survey, question 12; NSWP-II Final Report Volume 2 Report, page 22.

INCOME STANDARDS AND GUIDELINES FOR DETERMINING ECONOMIC/FAMILY UNIT

To qualify for WIC, prospective participants must have income at or below a household income level or standard set by the SA or must be determined adjunctively or automatically income eligible based on participation in certain programs as described above. The SA's income standard must be between 100 percent and 185 percent of the Federal poverty guidelines (issued each year by the U.S. Department of Health and Human Services).¹⁵

Nearly all SAs (97.6 percent) used 185 percent of the Federal poverty guidelines as income standard. Only 1 SA reported an income standard of 100 percent, and 1 SA reported using an income standard of 135 percent of the Federal poverty guidelines; both SAs served 10,000 or fewer participants (Appendix E, Table 2a).

A central component of the determination of income eligibility is the size of the potential participant's family economic unit, or household size. The FNS WIC definition of a family economic unit is a group of related or nonrelated individuals who are living together as one economic unit.¹⁶ SAs are permitted to give additional guidance to LAs to determine a WIC applicant's family economic unit. More than half of SAs (56.1 percent) did not give additional guidelines to LAs to determine the family economic unit (Appendix E, Table 4a). This information is comparable to results from 2009 when 58.5 percent of SAs did not give additional guidelines to LAs (Appendix E, Table 4b).

Of the 43.9 percent of SAs providing additional guidance ($n = 36$), more than half of SAs (58.3 percent) indicated providing additional guidance and examples to help the LA determine the family economic unit for specific situations, such as foster children, service members, joint custody arrangements, child support, adoption, institutionalized/incarcerated or homeless family members, and pregnant women (Exhibit 4). Another large proportion of SAs (44.4 percent) also reported that the economic unit is defined as those that share goods/services/food in addition to income. One-third of SAs (33.3 percent) indicated that multiple economic units can reside under one roof but do not share resources. One-fifth of SAs (19.4 percent) reported that other guidelines were given. Examples of other guidelines included everyone living in the home is counted as an economic family unit and income is counted for all individuals who work ($n = 1$ SA); in joint custody cases, the child is counted as part of either the mother's or father's household, not both, when determining the WIC household size for each parent ($n = 1$ SA); and residents of a homeless facility or an institution are not counted as an economic unit ($n = 1$ SA).

¹⁵ U.S. Department of Agriculture, Food and Nutrition Service. (2020). "WIC Eligibility Requirements."

<https://www.fns.usda.gov/wic/wic-eligibility-requirements>

¹⁶ Government Publishing Office. 2020. *Electronic Code of Federal Regulations 7 CFR Part 246.1*. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

Exhibit 4. Additional Guidelines Given by SAs to the LA to Determine Economic/Family Unit, Above and Beyond Federal Requirements



Notes: Findings for whether additional guidelines were given by SAs to LAs are based on the responses from 82 SAs. Findings that specify the additional guidelines given are based on the responses from 36 SAs. Total sample size = 89. Additional guidelines were specified in an open-text response. Open-text responses were coded into one or more types of guidelines; percentages may not sum to 100.

Source: Appendix E, Table 4a; NSWP-III State Agency Survey, question 3.

MILITARY ALLOWANCES EXCLUDED FROM HOUSEHOLD INCOME

SAs have the option to exclude military housing allowances (BAH) when determining household income. The majority of SAs excluded the BAH (82.7 percent) for off-base housing and the OCONUS COLA (75.3 percent) provided to active duty uniformed service members in foreign countries, U.S. territories, Alaska, and Hawaii (Appendix E, Table 2b). More than half of SAs reported that they exclude Overseas Housing Allowance (OHA) and Family Separation Housing (FSH) provided to service members for overseas housing (67.9 percent for OHA and 64.2 percent for FSH; Appendix E, Table 2b).

Between 2009 and 2019, the percentage of SAs excluding all types of military allowances from income determination increased: from 76.8 percent in 2009 to 82.7 percent in 2019 for BAH, from 63.4 percent in 2009 to 75.3 percent in 2019 for OCONUS COLA, from 52.4 percent in 2009 to 64.2 percent in 2019 for FSH, and from 54.9 percent in 2009 to 67.9 percent in 2019 for OHA (Appendix E, Table 2c).

Requirements and Guidance for the WIC Certification Process

INCOME DOCUMENTATION

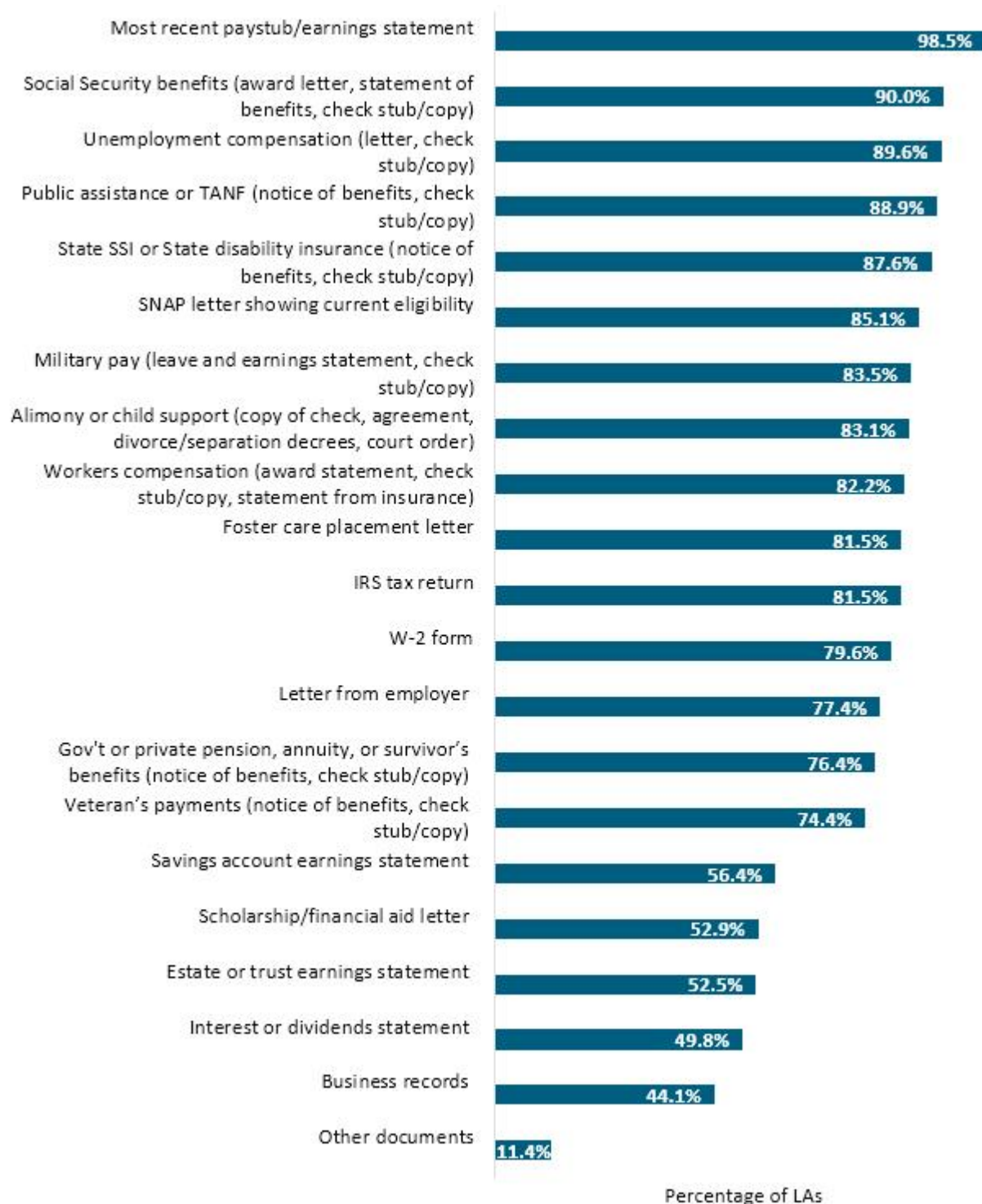
As part of the certification process, WIC applicants must provide documentation of all sources of income and/or documentation of participation in other adjunctive or automatically income-eligible programs in order to meet the requirements for determining income eligibility for WIC.

Based on weighted responses from the NSWP-III LA survey,¹⁷ nearly all LAs (98.5 percent) indicated that they accept a most recent¹⁸ paystub/earning statement (Exhibit 5), followed by documentation of Social Security benefits (90.0 percent) and unemployment compensation (89.6 percent). Other frequently reported accepted documents are shown in the exhibit below.

¹⁷ For more information on the LA Survey, methods, and analysis, please see Appendix A.

¹⁸ Please note that while the survey question asked for first pay stub, the intent was to ask for most recent pay stubs as that is the requirement for WIC income eligibility.

Exhibit 5. Documents Accepted by LAs That Satisfy Income Documentation Requirements



Notes: Weighted $n = 1,796$; Unweighted $n = 717$. Total sample size = 862. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: Appendix F, Table 6a; NSWP-III Local Agency Survey, question 3.

LAs were asked to rank the most frequently provided documents to satisfy the income requirement among the documents that were previously indicated as accepted. Of the LAs that indicated Medicaid documentation was accepted, more than three-quarters (79.1 percent) further indicated that this was one of the most frequently provided documents (Appendix F, Table 6b).¹⁹ Less than half of LAs (43.6 percent) that indicated a most recent paystub or earnings statement was accepted further indicated this document was one of the most frequently provided documents.

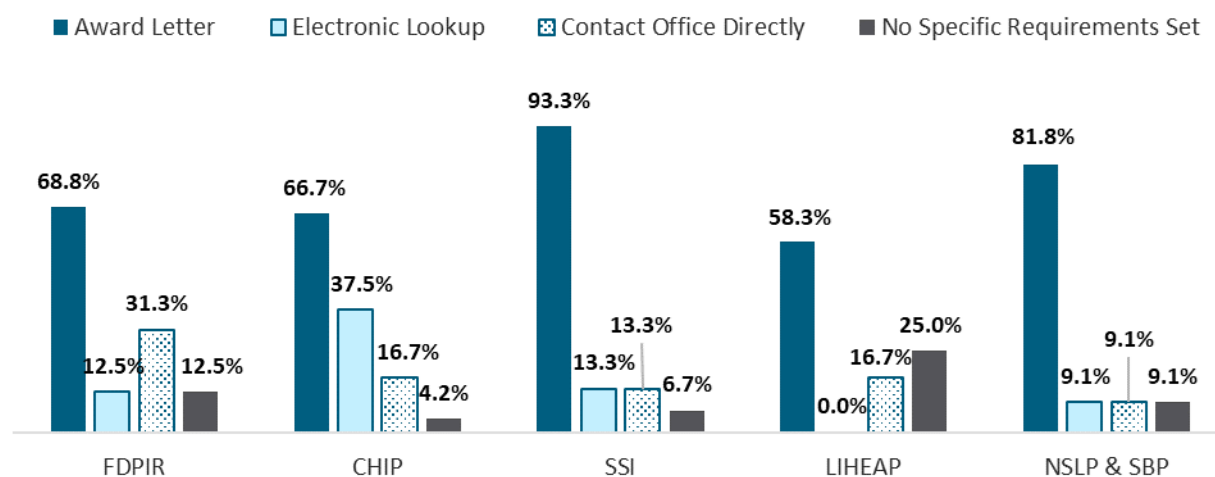
LAs can accept benefit award letters/notices and valid program/member ID cards (with eligibility dates) or confirm electronically for documentation of program participation.²⁰ The majority of LAs accepted an award letter or notice of benefits (95.8 percent), electronic access (86.2 percent), and a valid program or member ID card (75.7 percent) (Appendix F, Table 6c). When LAs ranked the most frequently provided program participation documentation, more than half of LAs that reported accepting electronic access further indicated this as one of the most frequently used methods (57.8 percent) followed by 44.3 percent of LAs that accepted a valid program or member ID card (Appendix F, Table 6d).

In the SA survey, SAs reported the types of program participation documentation for adjunctive and automatic eligibility determination. Across all the programs, SAs indicated that they mostly determined eligibility through award/participation letters, ranging from 58.3 percent for LIHEAP of the 12 SAs indicating that they accepted LIHEAP for automatic income eligibility and 93.3 percent for SSI of the 15 SAs indicating that they accepted SSI for automatic income eligibility (Exhibit 6). This finding aligns with Federal guidelines that instruct SAs to accept award/participation letters because electronic lookups are not available in every SA. However, in the case of Medicaid, the most popular method was an electronic lookup (68.3 percent across all 82 SAs). Electronic lookup is available to WIC SAs that have access to the Medicaid database (Exhibit 7).

¹⁹ This response was provided in the survey question's "Other, specify" variable. Out of all LAs, 29.8 percent reported accepting Medicaid documentation as acceptable proof of income (Appendix F, Table 6a).

²⁰ When a potential participant brings documentation about SNAP or another family-oriented program, LAs need to see the eligibility letter that lists the specific individual applying for WIC.

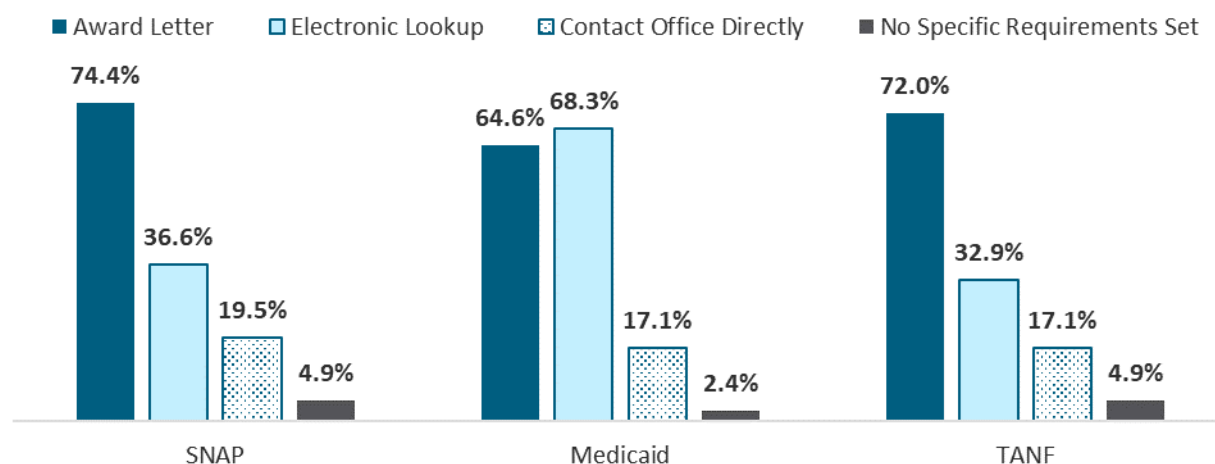
Exhibit 6. Documentation of Program Participation Required by SAs for Automatic Income Eligibility Determination



Notes: For FDPIR, the total number of respondents = 32 SAs. For CHIP, the total number of respondents = 24 SAs. For SSI, the total number of respondents = 15 SAs. For LIHEAP, the total number of respondents = 12 SAs. For NSLP and SBP, the total number of respondents = 11 SAs. Total sample size = 89. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: Appendix E, Table 3b; NSWP-III State Agency Survey, question 12.

Exhibit 7. Documentation of Program Participation Required by SAs for Adjunctive Income Eligibility Determination



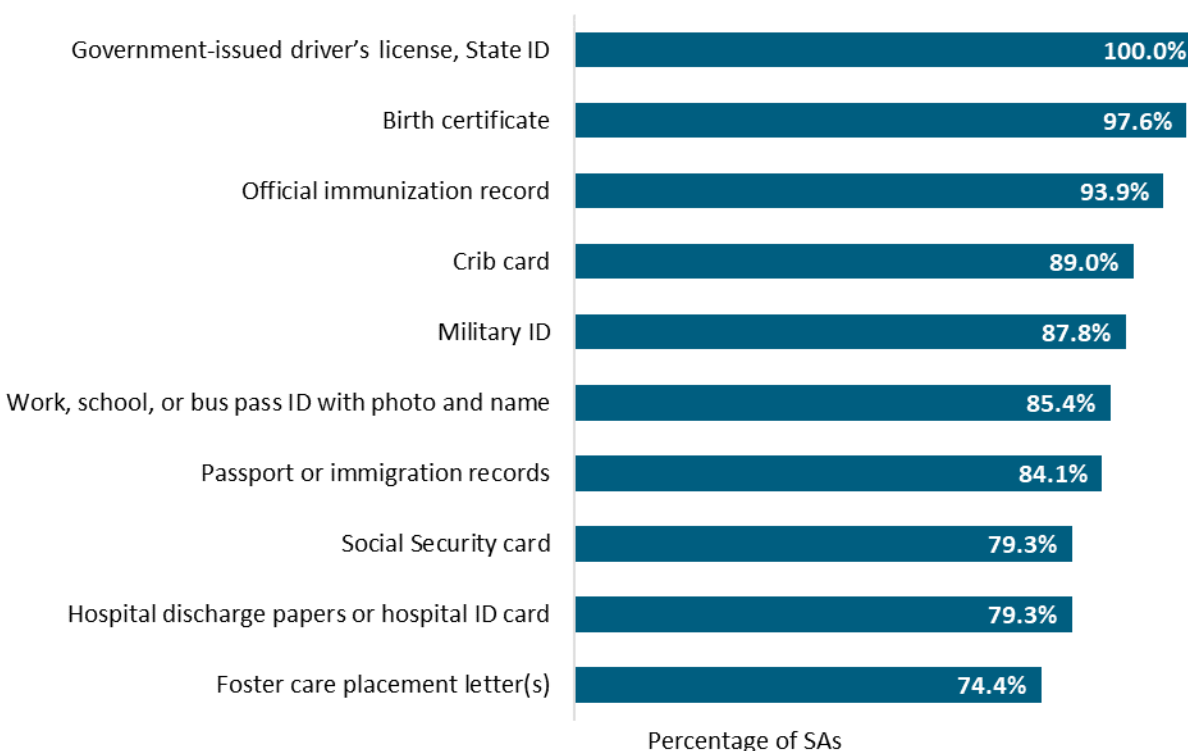
Notes: Findings are based on the responses from 82 SAs. Total sample size = 89. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: Appendix E, Table 3b; NSWP-III State Agency Survey, question 12.

IDENTITY AND RESIDENCY DOCUMENTATION

The certification process also includes the WIC applicants submitting documentation of their identity and residency. All SAs reported accepting a government-issued driver's license or State identification as documentation of identity (Exhibit 8). In addition, most SAs accepted a birth certificate (97.6 percent) and official immunization record (93.9 percent).

Exhibit 8. Top 10 Documents Accepted by SAs for WIC Applicant Documentation of Identity



Note: Findings are based on the responses of 82 SAs. Total sample size = 89. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: NSWP-III State Agency Survey, Question 1.

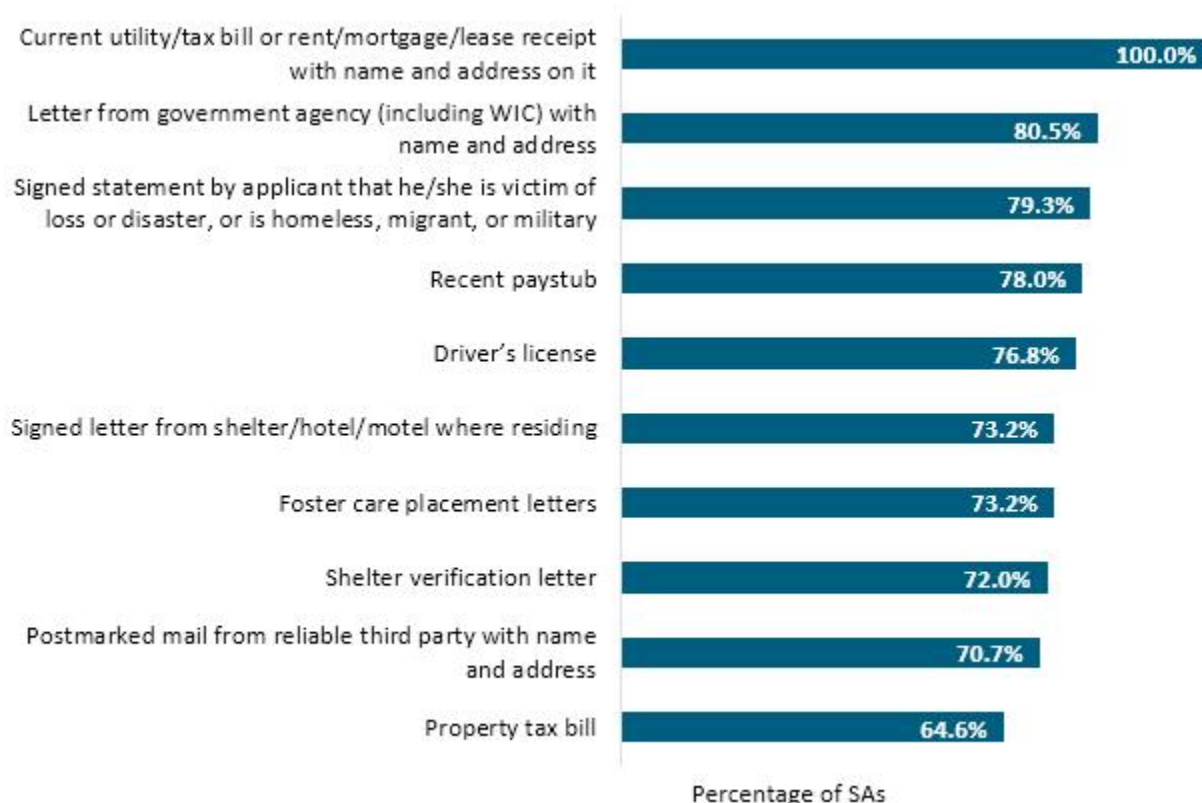
For the residency requirement, applicants must live in the State where they apply. Applicants who are served in areas where an ITO administers WIC must meet the ITO's established residency requirements.²¹ To confirm residency, all SAs accepted a current utility/tax bill, rent receipt, mortgage receipt, or lease receipt with name and address on it (Exhibit 9).²² More than three-quarters of SAs also accepted letters from government agencies (including WIC) with a name and address (80.5 percent); a

²¹ U.S. Department of Agriculture, Food and Nutrition Service. (2016). "WIC Eligibility Requirements." <https://www.fns.usda.gov/wic/wic-eligibility-requirements>

²² The survey response option was "current utility/tax bill, rent receipt, mortgage receipt, or lease receipt with name and address on it." The survey did not provide additional details on these documents; however, "tax bill" was intended to refer to property tax bill. In addition, while the survey specified "receipt" for rent, mortgage, or lease, it is possible that LAs also accept documentation that shows the applicant is charged these fees, and not documentation for proof of payment.

signed statement by applicant that he/she is a victim of loss or disaster, or is homeless, a migrant person, or service members (79.3 percent); a recent paystub (78.0 percent); or a driver's license (76.8 percent).

Exhibit 9. Top 10 Documents Accepted by SAs for WIC Applicant Residency



Notes: Findings are based on responses from 82 SAs. Total sample size = 89. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: Appendix E, Table 5a; NSWP-III State Agency Survey, question 2.

From 2009 to 2019, there were few changes in the percentage of SAs accepting the types of residency documentation that were asked in both surveys, such as driver's license (72.0 percent in 2009 and 76.8 percent in 2019) and signed statement by the applicant that he/she is victim of loss or disaster, or is homeless, a migrant person, or service members (72.0 percent in 2009 and 79.3 percent in 2019) (Appendix E, Table 5c).²³

²³ Appendix E, Table 5c shows large increases in the percentages of SAs accepting various documentation between 2009 and 2019; however, these specific findings from NSWP-II were based on responses written in by the respondents and were not among the predetermined survey response options. Thus, lower responses rates are expected, and these findings should be interpreted with caution.

VERIFICATION OF CERTIFICATION DOCUMENTATION

WIC participants may relocate from one area to another and wish to continue receiving benefits. In accordance with WIC regulations, SAs and LAs may share information collected by WIC about a participant to be used for WIC purposes, such as establishing certification in a new service area through the issuance of a VOC document.²⁴ To establish proof of certification, the original agency issues a VOC document to the participant's new agency. The VOC must have the participant's name, date of certification (including expiration), income eligibility dates, nutritional risk of the participant, printed name and signature of the LA official who performed the certification, the LA's contact information, and an identification number (or other form of VOC accountability). If any of these elements are missing, the new agency calls the previous one to collect this information, resulting in a complete VOC.

More than half of SAs (59.3 percent) did not accept incomplete VOC documents while the other 40.7 percent of SAs reported accepting incomplete VOCs (Appendix E, Table 3c).²⁵ Compared to the overall average, most SAs with 10,000 or fewer participants did not accept incomplete VOC documents (80.6 percent).

CERTIFICATION PERIODS AND ISSUANCE CYCLES

During the certification process, applicants are determined to be categorically eligible if they meet the requirements of one of the following categories²⁶:

- Pregnant woman will remain certified throughout the pregnancy, and “up to the last day of the month in which the infant becomes six weeks old or the pregnancy ends.”
- Postpartum woman will remain certified for a complete 6-month period after either the baby is born or when the pregnancy ends.
- Breastfeeding women's certification period lasts for approximately 6 months. SAs may grant discrepancy to their LAs to “certify a breastfeeding woman up to the last day of the month in which her infant turns 1 year old, or until the woman ceases breastfeeding, whichever occurs first.”
- Infants are granted certifications that last approximately 6 months; however, SAs may grant LAs permission to “certify an infant under six months of age up to the last day of the month in which the infant turns 1 year old, provided the quality and accessibility of health care services are not diminished.”
- Child participants are certified every 6 months or every year until they turn 5 years old. LAs are allowed to certify a child for 1 year, “provided the local agency ensures that the child receives

²⁴ Government Publishing Office. (2020). *Electronic Code of Federal Regulations 7 CFR Part 246.26(d)(1)(ii)*. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

²⁵ As noted, an SA that has indicated they accept an incomplete VOC has policies that allow the LA to call the originating LA to confirm program participation for the applicant, making their VOC complete per FNS requirements. Among the SAs accepting incomplete VOCs ($n = 33$), more than half ($n = 20$) specifically noted in the SA survey that they contacted the previous agency to retrieve any missing information.

²⁶ Government Publishing Office. 2020. *Electronic Code of Federal Regulations 7 CFR Part 246.7(g)* https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

the required health and nutrition assessments, as set forth in §246.11(e)(3)” of the WIC regulations.

As described above, the eligibility timeframe for a participant’s period of certification varies, depending on the certification category. Given that the SAs allow few discretions (e.g., temporary certifications or a shortened certification),²⁷ the majority of SAs did not grant additional discretion to LAs regarding certification periods (69.5 percent; Appendix E, Table 10c). However, 24.5 percent of SAs indicated modifications may be granted if appointment scheduling is problematic or if a participant's situation makes it difficult to make it to the clinic. The remaining 6.1 percent of SAs indicated other discretion is given, such as certifications may be extended by one month to align certification dates within a family. This information is comparable to results from 2009 when 72.0 percent of SAs reported that no additional discretion was given to LAs regarding certification periods (Appendix E, Table 10f).

Once a WIC applicant is certified by meeting the eligibility requirements, they are issued benefits. The benefits include supplemental foods designed to meet the special nutritional needs of WIC participants based on their certification category.²⁸ Issuance cycles of food benefits may be on a data month or calendar month.²⁹ A data month is also known as a “rolling” month, in which benefits continue until the next 30-day period of eligibility ends. A calendar month is when benefits continue until the end of the month. The majority of SAs used a data month instead of a calendar month issuance cycle (69.5 percent; Appendix E, Table 10b). This information is generally consistent with data from 2009, when 67.1 percent of SAs used a data month instead of a calendar month (Appendix E, Table 10e).

Policies Regarding Proxies

In some States, WIC participants can enlist a proxy to perform sanctioned actions on behalf of the WIC participant. A proxy means any person designated by a woman participant, or by a parent or caretaker of an infant or child participant, to obtain and transact food instruments or cash-value vouchers or to obtain supplemental foods on a participant’s behalf.³⁰

When SAs were asked to specify policies regarding actions permitted by proxies in their States, most SAs reported allowing proxies to obtain and redeem food benefits (84.0 percent) and attend education sessions (75.3 percent), while 39.5 percent of SAs indicated that proxies can act on behalf of a WIC applicant during certification appointments (Exhibit 10).

²⁷ Per WIC Regulations 246.7(g)(2), SAs may authorize LAs to establish shortened certification periods, on a case-by-case basis. Temporary certifications are a type of shortened certification that some SAs allow as a way to temporarily certify a participant for 30 days because they were not able to complete the certification process due to a missing required document. Participants offered a temporary certification period are required to come back to the clinic within 30 days to complete their certification.

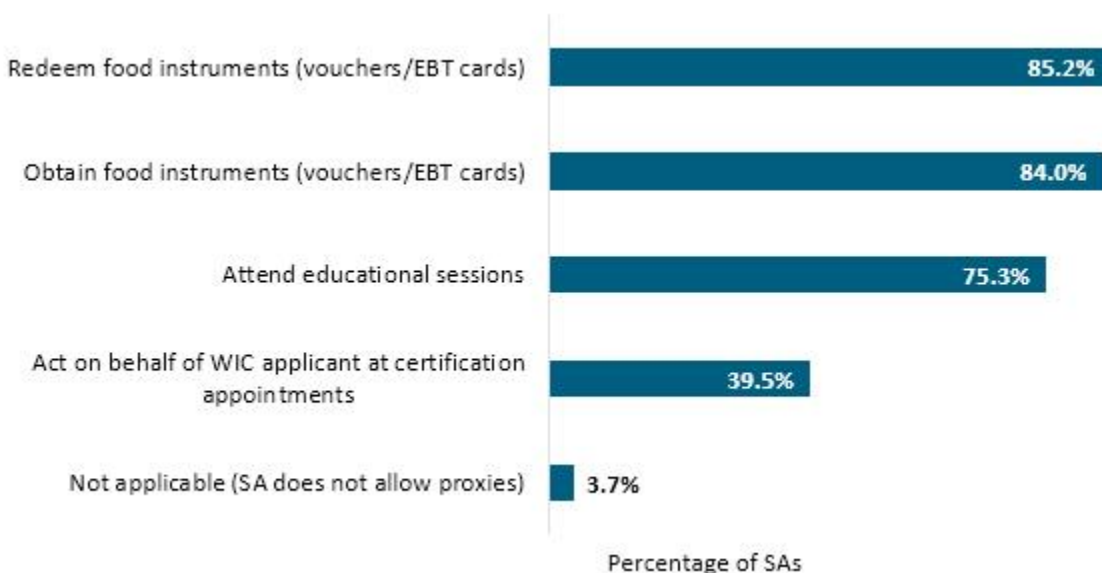
²⁸ U.S. Department of Agriculture, Food and Nutrition Service. (2013). “WIC Food Packages.” <https://www.fns.usda.gov/wic/wic-food-packages>

²⁹ U.S. Department of Agriculture, Food and Nutrition Service. (2007). “Certification and Monthly Food Benefits Issuance Cycles.” <https://www.fns.usda.gov/wic/certification-and-monthly-food-benefits-issuance-cycles-and-reporting-monthly-participation-fns-798>

³⁰ Government Publishing Office. (2020). Electronic Code of Federal Regulations 7 CFR Part 246.2. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac000f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

Compared to 2009, fewer SAs reported permissible actions by proxies. Notably, 84.0 percent of SAs in 2019 indicated proxies can obtain food instruments such as vouchers or electronic benefits transfer (EBT) cards (compared to 95.1 percent in 2009), and 85.2 percent of SAs indicated proxies can redeem food instruments (compared to 92.7 percent in 2009) (Appendix E, Table 11d).

Exhibit 10. SAs' Policies Regarding Actions Permitted by Proxies



Notes: Findings are based on responses from 82 SAs. Total sample size = 89. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100. One SA did not respond to this survey question.

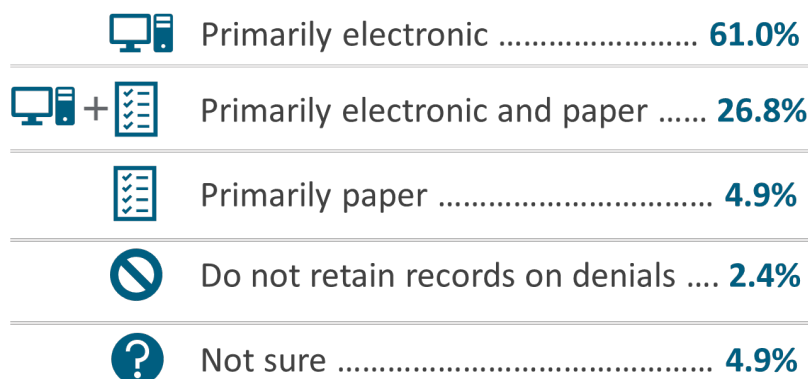
Source: Appendix E, Table 11a; NSWP-III State Agency Survey, question 7.

Record-Keeping Systems

Record-keeping is necessary to ensure appropriate management of WIC, and the use of electronic record-keeping systems can increase the efficiency of program operations. Please note that the SA survey was administered in summer 2019 before all SAs transitioned to EBT. EBT implementation may have an impact on the format in which SA records are maintained; therefore, these findings may not reflect the current status of SAs' systems.³¹ When SAs were asked about their record-keeping systems and record retention, the majority of SAs retained electronic records that permit review and confirmation of participant disqualifications (81.7 percent) and denials (61.0 percent) (Appendix E, Table 12a). The survey also asked the SA to provide additional details on the type of records maintained for denials (Exhibit 11). While 61.0 percent of SAs were maintaining electronic records, almost one-third of SAs (26.8 percent) reported maintaining electronic and paper records. Only 4.9 percent of SAs reported primarily using paper records.

³¹ For additional details on the current EBT status by SA, please see <https://www.fns.usda.gov/wic/wic-ebt-activities>.

Exhibit 11. Record-Keeping Systems Capabilities for Review and Confirmation of Participant Denials, by Percentage of SAs

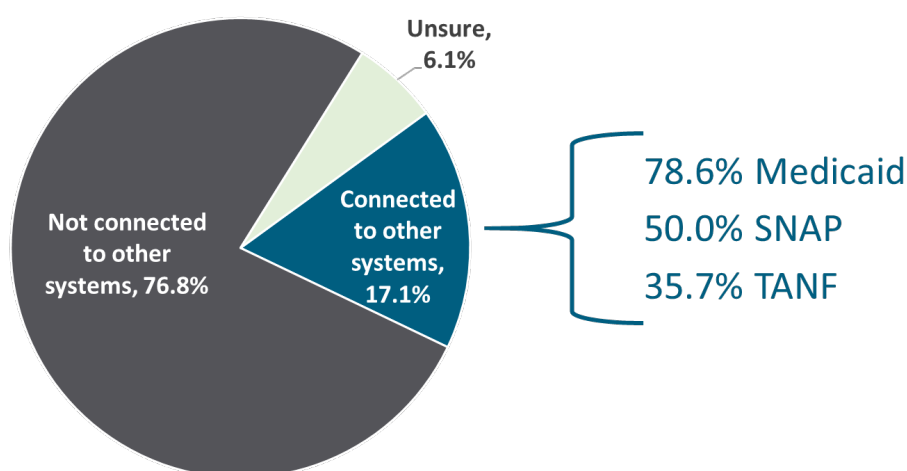


Note: Findings are based on responses from 82 SAs. Total sample size = 89.

Source: Appendix E, Table 12a; NSWP-III State Agency Survey, questions 24 and 25.

The majority of SAs (76.8 percent) reported they could not match records from other programs' systems, such as TANF or Medicaid, through their database to facilitate record-keeping or certification (Exhibit 12). The remaining SAs were connected to other systems (17.1 percent) or unsure if they were connected to other systems (6.1 percent). When results were separated by the number of participants the SA served, 90.6 percent of SAs with 10,000 or fewer participants reported not connecting to other programs' systems (Appendix E, Table 12b). Of those SAs that connected to other systems (17.1 percent), the majority reported matching with Medicaid's system (78.6 percent). Other systems that SAs were able to match records to were identified as SNAP (50.0 percent), and TANF (35.7 percent) (Exhibit 12). Additionally, a small percentage of other types of connected systems that were identified included an immunization registry and Department of Social Services (14.3 percent; Appendix E, Table 12b).

Exhibit 12. SAs' WIC Record-Keeping System Connection to Other Programs' Systems



Notes: Findings for the ability to match records from other programs' systems are based on responses from 82 SAs. Findings among the 17.1 percent of SAs that indicated they can match records from other programs' systems are based on responses from 14 SAs. Total sample size = 89.

Source: Appendix E, Table 12b; NSWP-III State Agency Survey, question 26.

SAs also were asked about the hardware systems and database software systems used to store participant data. Half of SAs (46.9 percent) reported using web-based hardware systems, along with Microsoft SQL Server as the most frequently reported database software systems used by 53.1 percent of SAs (Appendix E, Table 12c). Notably, over the past 10 years, more SAs are using web-based systems (46.9 percent in 2019 versus 6.1 percent in 2009) (Appendix E, Table 12d).

CONCLUSION

The study findings provide valuable insights and updates on WIC SA policies and practices since the last NSWP study conducted in 2009. Because the income eligibility determination is a key step in the WIC certification process, the SA survey consisted of several questions on this topic. While 37.0 percent of SAs used only adjunctive income eligibility with SNAP, Medicaid, and TANF, the other 67.0 percent also confirmed automatic income eligibility by participation in at least one other program. Compared to 2009, more SAs were accepting participation in FDPIR and LIHEAP in 2019 (approximately 11 and 7 percentage point increase, respectively).

SAs continue to confirm participation in these adjunctive/automatic income eligibility programs through documentation of award letters (ranging from 58.3 percent for LIHEAP of the 12 SAs indicating that they accepted LIHEAP for automatic income eligibility and 93.3 percent for SSI of the 15 SAs indicating that they accepted SSI for automatic income eligibility). However, in the case of Medicaid, the most popular method was an electronic lookup (68.3 percent across all 82 SAs), which is available in SAs that have access to the Medicaid database. These findings align with only 17.1 percent of SAs reporting their systems were connected to other programs' systems, such as TANF or Medicaid, to facilitate record-keeping or certification. Of these SAs, the majority reported matching with Medicaid's system (78.6 percent).

SAs are permitted to give additional guidance to LAs in addition to Federal requirements to determine a WIC applicant's family economic unit; therefore, the survey asked SAs whether they provided additional guidance, and if so, to specify the guidance provided. Less than half of SAs (43.9 percent) reported providing additional guidance to LAs to help determine an economic unit. The guidance varied across the SAs with the largest proportion (58.3 percent of SAs) providing additional guidance and examples to help the LA determine the family economic unit for specific situations, such as foster children, service members, joint custody arrangements, child support, adoption, institutionalized/incarcerated or homeless family members, and pregnant women.

Based on the study findings, an area for future research could be exploration of the barriers of the accessibility and use of technology that enables connecting to adjunctive/automatic income eligibility programs' systems. In addition, future research could examine how current guidance on determining an economic unit varies across SAs and the potential benefit of standardizing guidance across SAs.

As with all research studies, limitations of the design and methodology are possible. The SA and LA Survey were designed and tested to elicit accurate responses. Nevertheless, some response error is possible. Respondents may have unknowingly reported incorrect information or inadvertently checked the wrong response. While survey results were compared to NSWP-II when feasible (i.e., when similar questions were asked in both studies), a direct, one-to-one comparison should be made with caution. The total number of SA respondents ($n = 82$) was the same, but the specific SA respondents varied between the two studies.

Prepared by Capital Consulting Corporation (CCC) and 2M Research Services for the USDA Food and Nutrition Service (Project Officer: Karen Castellanos-Brown)

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