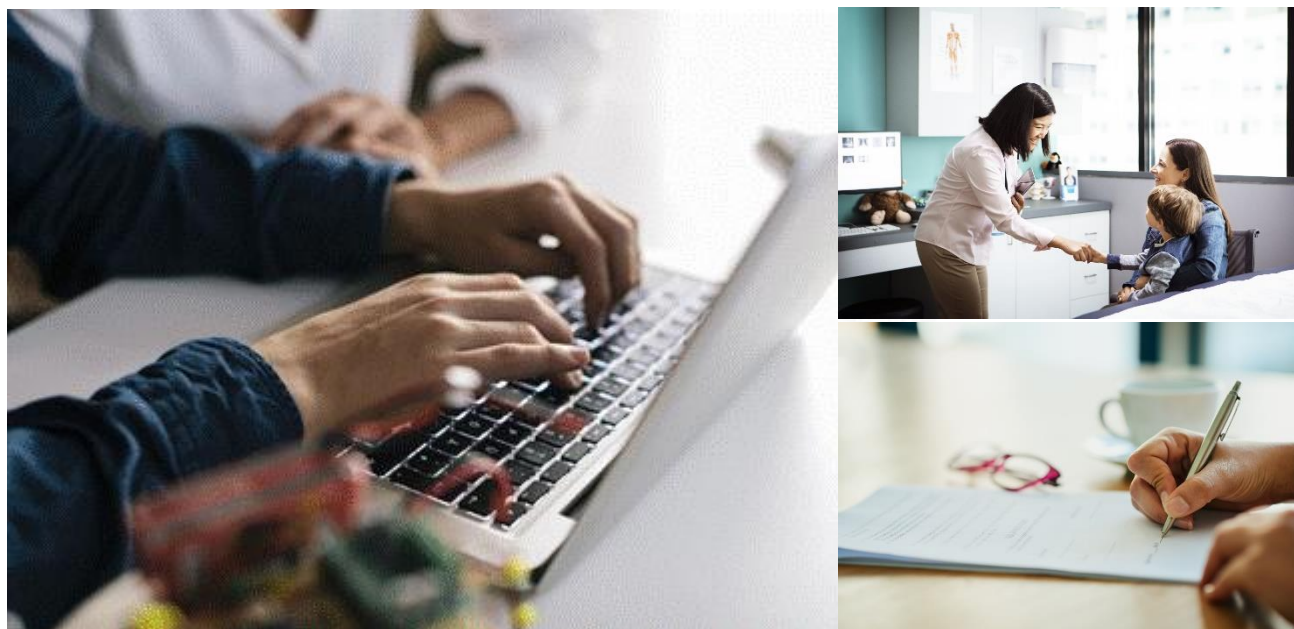


Third National Survey of WIC Participants (NSWP-III)

BRIEF REPORT 9: DENIED APPLICANTS IN WIC



This research was supported by the U.S. Department of Agriculture, Food and Nutrition Service. The findings and conclusions in this publication are those of the author(s) and should not be construed to represent any official USDA or U.S. Government determination or policy.

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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: This brief provides information on denied applicants in WIC, including SA and LA policies regarding denied applicants, characteristics of denied applicants, and denial errors.

Methods: Data were collected from the following sources during the summer and fall of 2019: a web survey completed by 82 WIC SA directors; a web survey completed by a nationally representative sample of LAs (weighted $n = 1,979$; unweighted $n = 714$); and an in-person survey that was administered to nationally representative WIC applicants who formally applied and were denied certification (weighted $n = 28,000$; unweighted $n = 86$). Data from the LA survey and denied applicant survey were weighted to produce national estimates reflective of all WIC LAs and denied applicants from summer 2019.

Findings:

- The majority (85.4 percent) of SAs reported having a policy that required LAs to keep information on denied applicants and the majority of LAs (88.9 percent) retained information on denied applicants.
- Nearly all SAs and LAs retained the name of the denied applicant (SAs: 97.1 percent, LAs: 98.8 percent); reason for denial (SAs: 97.1 percent, LAs: 98.2 percent); and date of denial (SAs: 97.1 percent, LAs: 96.7 percent).
- Approximately half of SAs (54.3 percent) reported the information is kept only in electronic form in 2019, which is more than double the number of SAs (25.6 percent) that reported only keeping information in electronic form in 2009.
- More than 60 percent of LAs reported that less than or equal to 1 percent of new applicants (67.3 percent) and current participants (64.8 percent) were denied in the last 12 months. Compared to 2009, the percentage of denials has decreased over time. A greater percentage of LAs estimated having denied more than 10 percent of new applicants in 2009 (3.6 percent) than in 2019 (0.8 percent) and current participants from 3.4 percent in 2009 to 1.3 percent in 2019.¹
- On average, across all LAs, the majority of new applicant denials (65.1 percent) and current participant past denials (59.5 percent) were attributed to income ineligibility.

¹ These findings should be interpreted with caution, as LAs were not asked to report the exact percentage of denials given or the exact number of new applicants and current participants seeking certification (or recertification).

- The Study Team was able to verify that the majority of denials (71.1 percent) were made correctly. The remaining denied applicants could not be verified (28.9 percent); during the in-person interview, these denied applicants provided responses and associated documentation that suggests that they met all eligibility criteria.

Conclusion: The findings suggest that, while denials for WIC certification are rare, the majority of LAs retained information on denied applicants. The Study Team's review of the denied applicant determinations suggests that the majority of denial determinations were made correctly.

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 U.S. Department of Agriculture 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.²

SAs are responsible for the effective and efficient administration of WIC in accordance with Federal regulations.³ The Federal regulations include specific requirements regarding the handling of applicant denials. For instance, any applicant denied certification must be informed in writing, including the reason for ineligibility, and the information is maintained on file at the LA. As a mechanism of oversight, SAs also have the authority to verify that denial determinations were made correctly.

WIC applicants must meet all of the following eligibility requirements to participate in the program:⁴

- Categorical
- Residential
- Income
- Nutrition Risk

Categorical: WIC applicants must be one of the following:

- Pregnant (during pregnancy and up to 6 weeks after the birth of an infant or the end of the pregnancy)
- Postpartum (up to 6 months after the birth of the infant or the end of the pregnancy)
- Breastfeeding (up to the infant's first birthday)
- An infant (up to the infant's first birthday)
- A child (up to the child's fifth birthday)

Residential: Applicants must live in the State where they apply or meet residency requirements established by the ITO in areas where WIC is administered by an ITO.

² U.S. Department of Agriculture, Food and Nutrition Service. (2019). *WIC Program: National level annual summary*. <https://fns-prod.azureedge.net/sites/default/files/resource-files/wisummary-6.pdf>

³ Government Publishing Office. (2020). *Electronic Code of Federal Regulations 7 CFR Part 246.7 (c), (j)*. https://www.ecfr.gov/cgi-bin/text-idx?SID=a6828ac00f6e75ae4679d5beecb637c&mc=true&node=pt7.4.246&rgn=div5#se7.4.246_13

⁴ U.S. Department of Agriculture, Food and Nutrition Service. (2020). *WIC Eligibility Requirements*. <https://www.fns.usda.gov/wic/wic-eligibility-requirements>

Income: Applicants must have income at or below the WIC Income Eligibility Guideline applicable in each State, or must be determined adjunctively or automatically income eligible based on participation in certain programs.⁵ The SA's income eligibility guideline 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).

Nutrition Risk: Lastly, applicants must be at nutrition risk, which is assessed by a health professional (e.g., physician, nurse, nutritionist), typically at the WIC clinic, at no cost to the applicant. The Third National Survey of WIC Participants (NSWP-III) did not examine the nutrition risk requirement of WIC eligibility since nutritional risk is not considered a source of over-certification based on the Institute of Medicine's report titled "Dietary risk assessment in the WIC program." This report states that people "who meet the eligibility requirements of income, categorical, and residency status are presumed to also meet the requirement of nutrition risk based on failure to meet Dietary Guidelines."⁶ In a 2003 study, Ver Ploeg and Betson acknowledged that the vast majority of participants who meet other eligibility requirements are likely to meet some nutrition risk criteria. Thus, nutritional risk was assumed.⁷

A denied WIC applicant is a prospective participant who applies for WIC benefits and is deemed ineligible based on any of the eligibility requirements listed above. Denial errors were determined when applicants met all WIC eligibility requirements for identity, residency, category, and income but were denied certification.

The Study Team used information obtained from in-person surveys with denied WIC applicants to verify whether applicants met each of the eligibility requirements:⁸

1. Category error could occur if applicants satisfied the necessary categorical criteria at the time of the certification appointment but were denied. Among infant and child applicants, birth dates were requested during the interview. The Study Team used the reported date of birth and certification appointment date to assess whether the applicant was up to 60 months old. Confirmation of the categorical status for pregnant, breastfeeding, and postpartum participants was based on self-reported responses. If women participants satisfied any of the following criteria but were denied, they were flagged as a categorical eligibility error.
 - Pregnant – If an applicant was pregnant or the certification appointment was within 6 weeks after the birth of the infant or end of the pregnancy.
 - Non-breastfeeding postpartum – If an applicant's certification appointment was within 6 months after the birth of the infant or the end of the pregnancy.
 - Breastfeeding postpartum – If an applicant's certification appointment was during the time up to the infant's first birthday.

⁵ Federal regulations specify that participation in Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Medicaid confers adjunctive income eligibility, but States may identify other State-specific programs that confer "automatic" income eligibility.

⁶ Institute of Medicine. (2002). *Dietary Risk Assessment in the WIC Program*. Washington, DC: The National Academies Press. <https://fns-prod.azureedge.net/sites/default/files/WICDietaryRisk.pdf>.

⁷ Ver Ploeg, M., & Betson, D. M. (2003). Estimating Eligibility Based on Meeting Nutritional Risk Criteria. In *Estimating Eligibility and Participation for the WIC Program: Final Report*. National Academies Press. <https://www.nap.edu/download/10804>.

⁸ The Study Team requested administrative data from the SAs and LAs for formal denials, and not-prescreened applicants. Formal denials are when the applicant completes the entire certification process for WIC and is then deemed ineligible.

2. Applicants were asked to provide documents to prove their residential address during the in-person interview. Residency error was determined if SA-accepted residence proofs were shown or if their document mentioned a residential address within the State but the applicant was denied by the LA.
3. Income eligibility error could occur when the applicant provided documentation for household income and the household income was within the Income Eligibility Guideline for the respondent in each State but the applicant was denied. Income eligibility error could also occur when the applicant provided proof of participation in adjunctive/automatic eligibility programs but the applicant was denied.
4. Identity errors may occur when applicants provide an SA-accepted proof of identity to the LA. For cases in which applicants did not provide an approved identity document, the Study Team examined applicants' documents for proof of residence and proof of income to confirm identity.

The 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, and NSWP-II was conducted in 2009.^{9,10}

Research Objective and Questions

One component of NSWP-III and the focus of this brief report is to provide information on SA and LA policies regarding denied applicants, demographic and socioeconomic characteristics of denied applicants, and distributions of reasons for denial for correctly and erroneously denied applicants.¹¹ Specifically, the brief report addresses the following research questions:

Policies and Procedures for Denied WIC Applicants

- What percentage of LAs and service delivery sites maintain records on denied applicants?
- What information is maintained?
- For these LAs, what is the distribution of denials by modality (e.g., screening phone calls versus formal in-person applicants)?
- What is the rate of denied applicants among new applicants?
- What is the rate of denied applicants among current participants seeking recertification?
- Are there significant differences in the rate of denied applicants between new applicants and current participants seeking recertification?
- For both groups, what are the distributions for reasons for denial?
- What are the SA's policies, if any, regarding documentation of certification denials?
- What guidance, if any, is provided for handling certification denials (e.g., are agencies required to provide written notice of the denial)?

⁹ U.S. Department of Agriculture, Food and Nutrition Service Office of Research and Analysis. (2001). *National survey of WIC participants: Final report*. Alexandria, VA.

¹⁰ 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.

¹¹ 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.

- What are the SA's policies regarding verifying that denial determinations were made correctly?

Denial Verification

- What is the rate at which WIC applicants are correctly or erroneously denied?
- What are the distributions of reasons for denial? Are there significant differences in distribution for reasons for denial?
- What are the demographic and socioeconomic characteristics of denied applicants (e.g., education, employment status, income, poverty level, age, race, ethnicity, primary language, marital status, housing)?

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, copies of the surveys, and analytic tables.

STUDY METHODOLOGY

Source of Data

The findings in this brief are based on data collected from three NSWP-III surveys during the summer and fall of 2019: the SA Survey, LA Survey, and Denied Applicant Survey (DAS). Table 1 lists the surveys fielded and associated operational details.

Table 1. NSWP-III Survey Summary

Survey	Type of Data Collection	Mode of Data Collection	Estimated Length of Survey ^a	Data Collection Period	Number of Completes	Response Rate ^b
SA Survey	Census	Web survey	66 minutes	June 3, 2019–October 11, 2019	82	92.1%
LA Survey	National sample	Web survey	60 minutes	June 3, 2019–October 11, 2019	714	82.8%
Denied Applicant Survey	National sample	In-person survey	39 minutes	June 23, 2019–November 10, 2019	86	19.9%

Notes: ^a Estimated length of survey is based on estimates developed during pretesting the survey instrument.

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

Survey Content

The SA and LA Surveys and the DAS 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 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 documentation 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 documentation 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)

Survey	Topics Included
	▪ 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
DAS (Appendix D)	▪ Valid verification of identity ▪ Documentation of residency with State's jurisdiction (or documentation of meeting ITO residency requirements) ▪ Information relevant to their certification category ▪ Number of adults, children, and infants in the household and a determination of which household members are part of the family/economic unit ▪ Documentation of income sources and amounts for each member of the family/economic unit at time of certification, including documenting income for adjunctively or automatically eligible WIC participants ▪ Documentation of current participation in program conferring adjunctive eligibility (Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families, or Medicaid), or State program conferring automatic income eligibility at the time of certification

Analysis

SA data. The SA data are derived from a census. Therefore, sampling adjustments, weighting, and tests of significance are not applicable. Descriptive results are presented for all 82 SAs that responded to the survey.

WEIGHTING

LA data. The LA data from 718¹² agencies were weighted to represent all 1,797 LAs that were part of the original sample frame. Please refer to the Technical Appendix A report for details on the weighting of the LA data.

DAS data. The responses from 86 denied applicants were weighted to represent all the denied applicants in the country. The Study Team used the estimated monthly average population of denied applicants, which was 28,000, based on information collected in 2009 from the NSWP-II study. Weighted statistics from the DAS data are presented in this report. Please refer to the Technical Appendix D report for details on the weighting of the DAS data.

SURVEY RESULTS

Survey results are presented as weighted percentages and means. To understand the differences among respondents, data were analyzed according to relevant subgroups as shown in Table 3. Due to the small sample size of denied applicants, subgroups are not reported for the DAS.

¹² Four partially completed surveys were also included with 714 completed surveys in the analysis.

Table 3. Subgroups Examined for Each NSWP-III Survey

Survey	Subgroups Examined
SA Survey (Appendix E)	- Type of organization (State/DC, ITO/Territory) - Number of participants served by the entire SA per month (up to 10,000; 10,000 to 75,999; 75,000 or more) - Location based on the FNS Region (Northwest, Mid-Atlantic, Midwest, Mountain Plains, Southeast, Southwest, Western)
LA Survey (Appendix F)	- Relationship of the LA to the parent SA (State affiliated, Local government, Non-government) - Number of participants served by the entire LA per month (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)

Tables with comparisons to NSWP-II are presented when feasible (i.e., when similar questions were asked of both studies) and can be found in Appendix E (SA data), F (LA data), and I (DAS data).¹³

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.¹⁴ Since an 80 percent response rate was achieved in the SA and LA Surveys, the Study Team did not conduct nonresponse bias analysis. The DAS achieved a 19.9 percent response rate, so nonresponse bias analyses were employed to determine whether there were respondent characteristics significantly associated with nonresponse that may have potentially introduced bias into the survey. Conducting a nonresponse bias analysis requires that the characteristics examined be available for both respondents and nonrespondents. Therefore, the Study Team reviewed the sampling frame, which came from administrative data provided by States, to identify variables that were available for all respondents sampled for the survey. Age of the applicant was identified as a statistically significant factor associated with the respondents' likelihood to complete the DAS. This variable was then used to calculate the adjustment factor to represent those who did not respond to the survey.

Per OMB guidelines, an item nonresponse analysis should be conducted if item response rate is less than 70 percent.¹⁴ Assessing item-level nonresponse bias analysis is not applicable to the DAS because a response was required on all screens. The SA and LA survey questions addressed in this report brief were answered by at least 70 percent of respondents; therefore, no item-level nonresponse bias analysis was needed per OMB.

¹³ Comparisons cannot be made to NSWP-I and NSWP-III, because NSWP-I did not include an SA survey and did not include LA or representative denied applicant-specific findings.

¹⁴ 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/infoereg/statpolicy/standards_stat_surveys.pdf

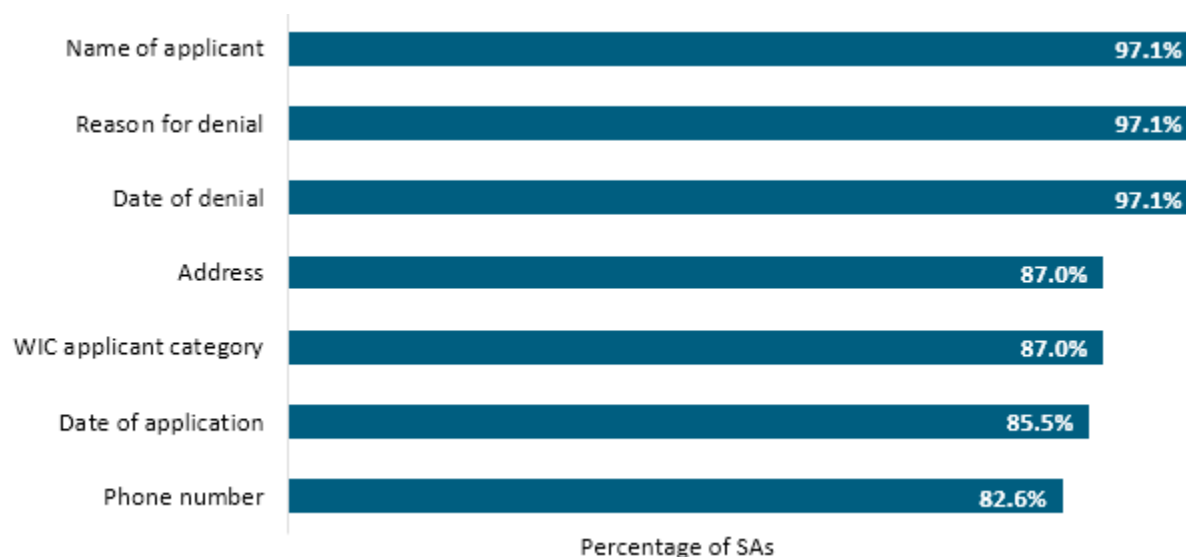
MAIN FINDINGS

Policies and Procedures for Denied WIC Applicants

SA POLICIES

Nearly all SAs in 2019 (97.5 percent) reported requiring LAs to provide written notification of certification denials to applicants, which is an increase from 87.8 percent of SAs in 2009 (Appendix E, Table 7e). The majority of SAs (85.4 percent) also reported having a policy that required LAs to retain information on denied applicants (Appendix E, Table 7a). When asked what information on denied applicants the SA requires the LA to retain, the most frequently reported types of information were name of the applicant (97.1 percent), reason for denial (97.1 percent), and date of denial (97.1 percent) (Exhibit 1). SAs less frequently reported requiring LAs to keep the denied applicant's address (87.0 percent), applicant category (87.0 percent), date of application (85.5 percent), and phone number (82.6 percent).

Exhibit 1. Type of Documentation SAs Required LAs to Retain for Denied WIC Applicants



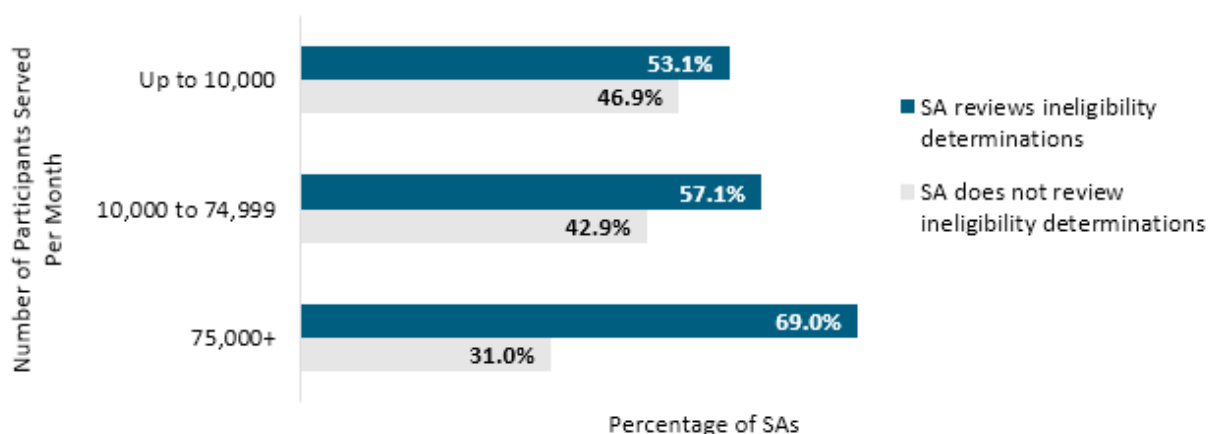
Notes: Findings are based on responses from 69 SAs. This survey question allowed the respondent to select all options that applied; percentages will not sum to 100.

Source: Appendix E, Table 7a; NSWP-III State Agency Survey, questions 15–16A.

Among the SAs that required LAs to retain information on denied applicants, more than half (54.3 percent) reported the information is kept only in electronic form, while a third (32.9 percent) kept both paper and electronic copies. A small proportion of SAs (10.0 percent) retained only paper copies, and very few (2.9 percent) did not have specific requirements on the format in which documentation was retained (Appendix E, Table 7a). Since 2009, the percentage of SAs that retained only electronic copies of information on denied applicants more than doubled from 25.6 percent to 54.3 percent in 2019 (Appendix E, Table 7d). More than half of SAs (59.8 percent) reviewed ineligibility determinations to verify whether denial determinations were made correctly, while the remaining 40.2 percent did not

review ineligibility determinations (Appendix E, Table 7c). SAs with 75,000 or more participants served per month were more likely to review ineligibility determinations on denied applicants than SAs with fewer participants served per month (Exhibit 2).

Exhibit 2. SA Procedures for Verifying That Denial Determinations Were Made Correctly, by Number of Participants Served per Month



Note: Findings are based on responses from 82 SAs.

Source: Appendix E, Table 7c; NSWP-III State Agency Survey, question 17, 17A.

The SAs that reviewed ineligibility determinations provided insights into their review process in open-text responses, which were reviewed for common themes. Almost three-quarters of SAs (73.5 percent) reported they verified denial determinations during management reviews/evaluations/onsite monitoring (i.e., LA Management Evaluations), and one-third (32.7 percent) delegated the review to senior staff (such as WIC Director/Coordinator/Operations Manager) (Appendix E, Table 7c).

LA POLICIES

Similar to the SA findings, the majority of LAs (88.9 percent) retained information on denied applicants.¹⁵ This was generally consistent with data from 2009, when 84.1 percent of LAs retained information on denied applicants (Appendix F, Table 1h). LAs that indicated that they did not retain information on denied applicants (11.1 percent) were prompted to explain the reason. The most frequently reported response (25.3 percent) was that their LA did not retain this information because denials were rare, or denials were made over the telephone through an informal screening process and applicant information was not retained. Other frequently reported reasons for not retaining information on denied applicants were that a letter was given to the applicant (17.5 percent), there was no requirement to do so (9.3 percent), or that system limitations made it so that they could not access data or run reports for denials (8.6 percent). Some LAs (19.4 percent) did not provide a reason for not retaining information on denied applicants (Appendix F, Table 1a).

As for the type of information that is retained, the majority of LAs retained the name of the applicant (98.8 percent), reason for denial (98.2 percent), date of denial (96.7 percent), date of application (92.7

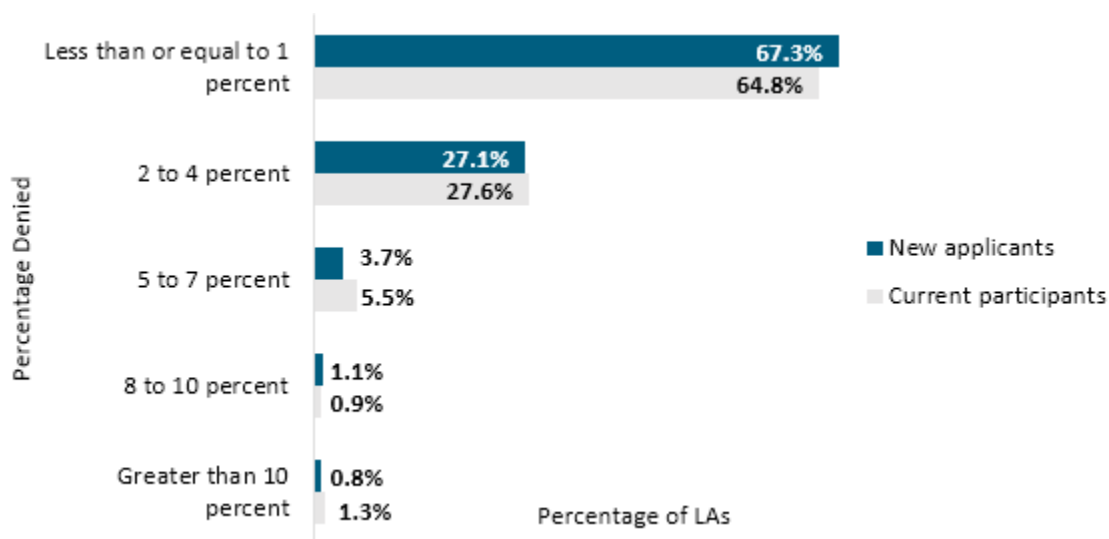
¹⁵ The LA Survey did not reference a time period when records could be removed. See Appendix A for a copy of the LA Survey.

percent), WIC applicant category (85.6 percent), address (83.3 percent), and phone number (82.4 percent). These findings are generally consistent with data from 2009 (Appendix F, Table 1h).

LAs that provided an official letter of denial to applicants who were determined ineligible for WIC *and* that screened applicants by telephone to make an eligibility determination (60.0 percent) were asked to estimate the percentage of denials through screening phone calls versus formal, in-person appointments in the past 12 months. Among these LAs, denials through formal in-person appointments were more frequently reported (42.0 percent) than denials through screening phone calls (28.1 percent) (Appendix F, Table 1b).

All LAs were asked to estimate the percentage of denials for new applicants and current participants within the last 12 months. The percentage distribution of denials for new applicants and current participants seeking certification (or recertification) was relatively consistent and did not differ significantly (Appendix F, Table 1e). More than 60 percent of LAs reported that less than or equal to 1 percent of new applicants (67.3 percent) and current participants (64.8 percent) were denied in the last 12 months, and approximately 1 percent of LAs reported that greater than 10 percent of new applicants (0.8 percent) and current participants (1.3 percent) were denied in the last 12 months (Exhibit 3). In addition, when segmented by urbanicity, completely rural LAs had slightly higher rates of denials greater than 10 percent for new applicants (3.0 percent) and current participants (4.6 percent) when compared to mostly rural and mostly urban LAs (Appendix F, Table 1c and 1d).

Exhibit 3. Reported Estimates of New WIC Applicants and Current WIC Participants That Were Denied in the Last 12 Months



Note: Weighted $n = 1,778$; unweighted $n = 710$.

Source: Appendix F, Tables 1c and 1d; NSWP-III Local Agency Survey, question 9.

The percentage of LAs that estimated having denied more than 10 percent of new applicants decreased from 3.6 percent in 2009 to 0.8 percent in 2019, and the percentage of LAs that denied more than 10 percent of current participants decreased from 3.4 percent in 2009 to 1.3 percent in 2019 (Appendix F, Table 1i). These findings should be interpreted with caution, as LAs were not asked to report the exact

percentage of denials given or the exact number of new applicants and current participants seeking certification (or recertification).

Reasons for denials were also examined in the LA Survey. On average, across all LAs, 65.1 percent of new applicant denials were attributed to income ineligibility, followed by 10.1 percent due to categorical ineligibility, 6.8 percent due to lack of residency documentation, and 6.2 percent due to lack of identity documentation. LAs also reported that an average of 32.4 percent of new applicant denials were for other reasons, which included lack of required documentation provided for income, adjunctive eligibility, or unspecified documentation (weighted $n = 23$); the applicant did not come back after 30-day temporary certification (weighted $n = 12$); and the applicant did not bring the infant/child to the appointment (weighted $n = 3$) (Appendix F, Table 1g).

A similar distribution was observed for current participant past denials. On average, across all LAs, 59.5 percent of current participant past denials were attributed to income ineligibility; 22.1 percent were attributed to categorical ineligibility; 7.6 percent were attributed to lack of residency documentation; and 6.5 percent were attributed to lack of identity documentation. LAs also reported that an average of 41.0 percent of denials were for reasons other than those stated above, which included similar reasons given for new applicants (Appendix F, Table 1f).

The average percentage of denials across all LAs due to lack of identity documentation in 2019 (6.2 percent for new applicants and 6.5 percent for current participants) was lower than in 2009 (21 percent).¹⁶ Similarly, the average percentage of denials across all LAs due to categorical ineligibility in 2019 (10.1 percent for new applicants and 22.1 percent for current participants) was lower than in 2009 (33.9 percent) (Table 4).

Table 4. LA-Reported Reasons for Denials in 2009 and 2019

Reasons	2009	2019	
		New Applicants	Current Participants
Income ineligibility (average %)	66.2	65.1	59.5
Categorical ineligibility (average %)	33.9	10.1	22.1
Lack of documentation provided for residency (average %)	13.9	6.8	7.6
Lack of documentation provided for identity (average %)	21.1	6.2	6.5
Other (average %)	51.1	32.4	41.0
Total number of respondents (weighted n)	2,291	1,664	1,512
Total number of respondents (unweighted n)	503	666	606

Note: In 2019, the percentage of denials by reason was asked separately for new WIC applicants versus current WIC participants. Examples of other reasons included lack of required documentation provided for income, adjunctive eligibility, or unspecified documentation (weighted $n = 23$); the applicant did not come back after 30-day temporary certification (weighted $n = 12$); and the applicant did not bring the infant/child to the appointment (weighted $n = 3$).

Source: Appendix F, Table 1k; NSWP-III Local Agency Survey, question 10.

¹⁶ Comparisons to 2009 should be made with caution because NSWP-II did not separate the average percentages of denials by new applicants and current participants.

Characteristics of Denied Applicants

DEMOGRAPHICS

The DAS respondents were individuals who completed the entire certification process for WIC, and who were deemed ineligible. This sample did not include individuals who just completed an online or telephone prescreening. The average age of infant/child denied applicants was approximately 2 years. The majority (62.0 percent) of infant/child denied applicants were aged 1 to 5 years, while the remaining (38.0 percent) were younger than 1 year of age. The average age of adult denied applicants was approximately 29 years. Almost half of the denied infant/child (49.4 percent) and denied adult (45.5 percent) applicants were Non-Hispanic White, and a majority (89.1 percent of infant/child denied applicants and 91.3 percent of denied adult applicants) spoke English at home. Most denied adult applicants were not married (54.0 percent) and were employed (84.0 percent) (Appendix I, Objective II Table 6).

ECONOMIC STATUS

The DAS included a series of questions to determine the household income of denied WIC applicants. Sources of income reported by applicants were mapped to the list of acceptable documents for each SA. For each applicable income source, applicants were asked to provide documentation of their income; the frequency of pay, along with the duration of pay, was noted from this documentation. Applicants also were asked whether they were income eligible for WIC due to their participation in an adjunctive or automatic income eligibility program; if yes, applicants were asked to provide proof of program participation. The Study Team standardized the reported income from all household members and across various sources to determine the monthly household income.¹⁷ Among households with infant/child denied applicants, 76.6 percent of the households were below Income Eligibility Guidelines within the State (Appendix I, Objective II Table 6).

More than half (57.2 percent) of households with adult denied applicants were below 185 percent of the Federal Poverty Level (Appendix I, Objective II Table 6).

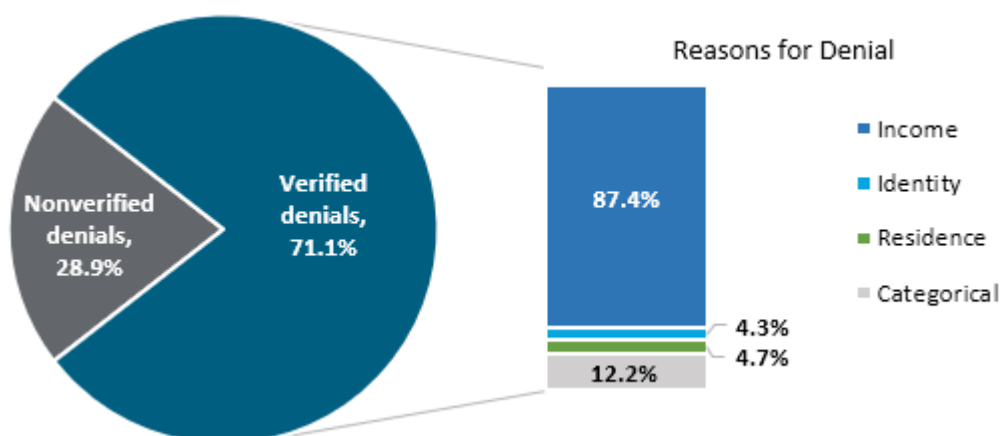
Denial Verification

In addition to income amounts, the DAS collected information about applicants' household composition from various sources for each member in the family/economic unit. The DAS also requested documentation that verified the applicant's identity, place of residence, and adjunctive or automatic income eligibility status. This information was used to evaluate whether the denial could be verified. Verified denials are cases that were denied by the LA and confirmed by the DAS to have not met at least one of the eligibility criteria (i.e., they did not provide sufficient documentation during the DAS to meet any of the eligibility criteria). A case was identified to be a nonverified denial if the case satisfied income, identity, residence, and categorical eligibility criteria during the DAS but was denied by the LA.

¹⁷ Please see Appendix D for details of how monthly household income was calculated.

The study found 28.9 percent of denied applicants were denied but met all eligibility criteria—that is, these cases were nonverified denials. The remaining 71.1 percent were determined to be verified denials (Appendix I, Objective II Table 5). Among the verified denials, 87.4 percent were found to have not met income eligibility criteria, 12.2 percent were found categorically ineligible, and the remaining applicants were determined ineligible for not fulfilling the identity or residency requirements (Exhibit 4). Overall, the ratio of verified denials to total applicants¹⁸ was 2.2 percent and the rate of nonverified denials to total applicants was 0.9 percent (Appendix I, Objective II Table 5).

Exhibit 4. Percentage of Nonverified and Verified Denials and Reasons for Denial Among Verified Denials



Notes: Percentages in the pie chart are based on the population of denied WIC applicants: weighted $n = 28,000$; unweighted $n = 86$. Percentages in the bar chart are based on the 71.1 percent of denied applicants that were found to be verified denials: weighted $n = 19,914$; unweighted $n = 63$. Denied applicants can be denied for more than one reason; percentages in bar chart will not sum to 100.

Source: Appendix I, Objective II Table 5b; NSWP-III Denied Applicant Survey.

The Study Team assessed whether there were any significant differences between the percentages of denied applicants that were verified denials across the different reasons for denials. The percentage of applicants that were verified denials due to income ineligibility (87.4 percent) is significantly different ($p < 0.05$) from the percentage of denied applicants that were verified denials for reasons other than income ineligibility (4.3 percent due to identity ineligibility, 4.7 percent due to residence ineligibility, and 12.2 percent due to categorical ineligibility) (Appendix I, Objective II Table 5).

¹⁸ Total applicants equal the number of certified WIC participants plus the number of denied applicants.

CONCLUSION

The study findings provide insights into SA and LA policies regarding denied applicants, characteristics of denied applicants, and potential denial errors. The use of electronic documentation by SAs has increased since the last study—specifically, the percentage of SAs that retained only electronic copies of information on denied applicants more than doubled from 25.6 percent in 2009 to 54.3 percent in 2019. In the future, researchers could interview SAs on the best practices and challenges faced while switching from paper to electronic documentation.

SAs also provided insight on their review of ineligibility determinations. More than half of SAs (59.8 percent) reviewed ineligibility determinations to verify whether denial determinations were made correctly, while the remaining 40.2 percent did not review ineligibility determinations. Future research among those SAs that review ineligibility determinations could assess best practices for reviewing ineligibility determinations in an efficient and effective manner.

Data collected from LAs show that denials are rare, with more than 60 percent of LAs reporting that less than or equal to 1 percent of new applicants (67.3 percent) and current participants (64.8 percent) were denied in the last 12 months. The majority of applicants were denied due to income ineligibility (an average of 65.1 percent of new applicant denials and an average of 59.5 percent of current applicant denials). The LA survey did not collect specifics on the reason for not meeting income guidelines (i.e., was it due to a change in adjunctive/automatic income eligibility status or change in household income?). The specific reasons for not meeting income guidelines could be collected as part of future LA surveys. While denials for WIC certification are rare, the majority of LAs (88.9 percent) retained information on denied applicants. Of the LAs that indicated they did not retain information on denied applicants, 9.3 percent indicated there was no requirement to retain information. Since Federal regulations require that LAs should keep information on denied applicants on file, this finding suggests expanded training on requirements related to retaining denied applicant information would be beneficial.

The Study Team was able to verify that the majority of denials (71.1 percent) were made correctly. The Study Team was unable to verify the remaining 28.9 percent of denied applicants; during the in-person interview, these applicants provided responses and associated documentation that suggests that they met all eligibility criteria. However, the Study Team faced specific limitations in determining verified and nonverified denials. The Study Team assumes that the sample did not include individuals who completed an online or telephone prescreening, since the administrative request sent to SAs included a request for formal denials, but not prescreened applicants. Second, while interviewers asked the denied applicant to provide the same documentation during the interview that they provided during the WIC certification appointment, the applicant might not have provided the same documentation. The Study Team did not verify that the documentation provided during the interview was the same documentation on file at the LA. Third, category eligibility error of adult applicants was determined using self-reported responses. Further verification of these responses would require access to medical records. In light of these limitations, the denial error findings should be interpreted with caution.

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

Suggested citation:

Magness, A., Chakravorty, A., Williams, K. Papa, F., Okyere, D., Santos, K., Nisar, H., Bajowski, F., & Singer, B. (2021). *National Survey of WIC Participants: Denied Applicants in WIC: Brief Report #9*. Prepared by Capital Consulting Corporation and 2M Research Services. Contract No. AG-3198-K-15-0077. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Project Officer: Karen Castellanos-Brown. Available online at: <https://www.fns.usda.gov/research-and-analysis>.

Acknowledgments:

The Study Team would like to thank the WIC State and local agency staff, and WIC participants and applicants who participated in the study. We greatly appreciate the guidance provided throughout the entire project by our partners at the U.S. Department of Agriculture, Food and Nutrition Service, with special assistance from Karen Castellanos-Brown, Courtney Paolicelli, Jennifer Teters, Lisa Southworth, Marta Kealey, Jessica Owen Day, and Karen Meade.

We also greatly appreciate the feedback and support from our Expert Panel Members: Carol Eyermann, Donna Hines, Mindy Jossefides, Julie Reeder, and Jackson Sekhobo. The Study Team also would like to thank our partners at Abt Associates for their support with this effort. We also appreciate Paul Ruggiere, Mary Ann Latter, Moyo Kimathi, Amy Wieczorek-Basl, Yuhan Huang, Shu Li, and the rest of the data collection and analysis staff who contributed to this study. MacKenzie Regier, Cindy Romero, Gail Clark, and Joshua Townley provided invaluable quality assurance support throughout the study.

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