



December 8, 2021

Cynthia Long, Administrator, Food and Nutrition Services
cc: Sarah Widor, Director, Supplemental Food Programs Division
Policy and Program Development Division Food and Nutrition Service
PO Box 2884
Fairfax, VA 22031-0885

**RE: Request for Information: Center for WIC Modernization and Delivery
86 FR 61752**

Dear Cynthia Long:

In December of 2020, the American Public Human Services Association (APHSA) and Share Our Strength's No Kid Hungry Campaign launched the [Coordinating SNAP and Nutrition Supports \(CSNS\)](#) demonstration project. Through the project, APHSA and Share Our Strength are partnering to help state and local government agencies develop innovative strategies to reduce food insecurity among families with children by integrating access to SNAP with related nutrition programs such as the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

The six sites participating in the CSNS cohort—Hawai‘i, Kansas, Michigan, New Jersey, New Mexico, and Mecklenburg County, North Carolina—are executing projects that leverage data and technology improvements to address systemic barriers and promote equitable access to nutrition benefits. The sites are working to reduce cross-departmental silos, facilitate community engagement, and enhance client outreach and experience. Project focuses vary from coordination of data sharing between SNAP and WIC, development of new referral processes, formation of data analytics dashboards, and incorporation of participant experience to create more holistic access to food security programs.

While each site is following its own project timeline, the sites are all now in the implementation phase of their funded initiative. As the funder (Share Our Strength) and administrator (APHSA) of CSNS grants, we draw on observations and lessons learned from the planning and early implementation phases of the cohort to offer the enclosed comments in support of the establishment of the proposed Center for WIC Modernization and Delivery.

Please reach out to Jess Maneely at jmaneely@aphsa.org with any questions or opportunities for further discussion and collaboration.

American Public Human Services Association
1300 17th Street N, Suite 340
Arlington, VA 22209
www.APHSA.org

Share Our Strength, No Kid Hungry
1030 15th St NW, Suite 1101100W
Washington, DC 20005
[https://www.shareourstrength.org](http://www.shareourstrength.org)

Approach

APHSA and Share Our Strength draw from experience supporting six projects through our Coordinating SNAP and Nutrition Supports (CSNS) cohort to offer considerations for the establishment and design of the proposed Center for WIC Modernization and Delivery (the Center). As a funder and provider of technical assistance for the six sites—Hawai‘i, Kansas, Michigan, New Jersey, New Mexico, and Mecklenburg County, North Carolina—and informed by related technical assistance and cohort-style models of cross-program, data-driven, modernization efforts involving WIC agencies in additional states, APHSA and Share Our Strength share here some of the ways coordinated access to nutrition supports can improve the WIC application and certification process, the needs of state and local agencies to successfully implement coordination strategies, insights on services and resources that might help program administrators meet those needs, and considerations for a centralized approach to technical assistance through the Center.

Our experience demonstrates that effective support of agencies —

- **Facilitates cross-program alignment** that simplifies access to and receipt of WIC assistance,
- **Centers participants in program innovation efforts** meaningfully, and early in the conceptualization and scoping of modernization projects, and
- **Evaluates and disseminates promising practices** for peer agencies and support networks of diverse stakeholders.

Facilitating Cross-Program Alignment

A prevalent need across WIC agencies, which is shared by counterpart administrating programs including SNAP and Medicaid, is greater support for cross-program alignment in the pursuit of simplifying how families access the full range of nutrition and related supports that help them achieve well-being. As the USDA Food and Nutrition Service considers how to best support WIC agencies in improving enrollment and service delivery, we encourage the Center to prioritize cross-agency alignment in the services provided and resources made available—such as support with data sharing and matching, technology solution development, process alignment, and legal challenges.

To help WIC agencies advance cross-program alignment strategies, the Center should ensure its technical assistance supports both WIC agencies and the peer public assistance programs they must coordinate with to increase co-enrollment in WIC, including SNAP, Medicaid, TANF, and other family and nutrition support programs. Effectively supporting WIC and partner agencies with implementation of new technology-enabled solutions and data-driven process changes will require resources and expertise in various areas including: technology systems advancements, data and analytics, partnerships, project management, and specific subject matter expertise in areas such as legal and regulatory compliance and human centered design.

Technology Systems Advancements: Agencies seeking to modify or adopt new technology platforms to streamline connections across technology systems can benefit from resources such

as tips for tech vendor management, peer connections with state and local agencies that have undergone similar changes, and technical assistance standing up new solutions.

Through our work with the CSNS cohort and awareness of related efforts, it has become clear that certain functions are critical facilitators of success in cross-agency modernization work. Investments in Project Managers, Scrum Masters, and setting aside designated working sessions (i.e. “design sessions”) for tech teams from all agencies involved in the project have been key to bringing concepts together in a cohesive design. Working across agencies involves navigating across different vendors and different agency staff, all with subject matter expertise in specific areas. For modernization efforts to succeed and be sustained, it is important to identify necessary functions early on, create spaces for connection across agencies and their vendors, and ensure buy-in and foundational understanding of the project’s goals from all parties, which is a key skill of Project Managers. While WIC agencies and their counterpart program offices likely have their own resources for their respective technology systems, the Center can facilitate success in modernization efforts by making project management resources and services available that can help coordinate cross-agency work.

Additionally, the Center can support systems advancements by providing consultation and resources to develop and execute new technology solutions, such as:

- Application programming interfaces (APIs) that connect SNAP and WIC eligibility systems and enable streamlined administrative processes like checking for adjunctive eligibility for WIC;
- Improvements to management information systems (MIS) that streamline case processing and lay foundations for cross-system integrations – such as by standardizing data collection formatting;
- Automated data pooling, matching, and analytics systems to better understand program reach and gaps, which can enable tailored outreach to groups missing out on services; and,
- Systems integrations (for example via APIs) across government agencies as well as community-based partners that enable closed-loop referrals to WIC from partner organizations and to other services like SNAP, Medicaid, or Food Pantries to WIC, for instance.

Data and Analytics

The Center can contribute needed support with sharing data between WIC and other administering agencies, assistance analyzing and disaggregating shared data, and technical assistance developing interventions that utilize shared data—such as targeted and tailored outreach and retention projects and efforts to streamline enrollment processes.

Agencies in the CSNS cohort have worked to develop different data-related project concepts and materials, such as data standards documents, data dictionaries, data sharing agreements, memorandums of understanding, and other data governance materials. To assist agencies with building analytics that measure outcomes of cross-program alignment efforts to increase access, participation, and experience in WIC, the Center can provide assistance conceptualizing,

developing, and customizing such tools and materials. These products and services would be invaluable to WIC agencies and their counterparts in SNAP, Medicaid, TANF, and other programs/organizations that are or will soon be embarking on cross-program innovation initiatives.

In addition, the Center can create an accessible repository that inventories and catalogues examples used for different modernization purposes, so that agencies across states and localities can build on each other's progress. In the CSNS cohort, sharing sample Data Sharing Agreements and MOAs from similar projects has helped expedite this stage of newer initiatives that require cross-agency data use agreements.

Partnerships

In our work we have noted several critical relationships for moving cross-agency modernization work forward. The Center should consider ways it might facilitate and strengthen the development and depth of the following relationships through its services:

- Relationships within an agency across job functions (such as outreach coordinators and data analysts);
- Relationships across agencies within a state or locality, especially where job functions are similar (such as WIC, SNAP, and Medicaid leadership, data analysts, technologists, and outreach staff);
- Relationships with peer agencies across states and localities; and,
- Relationships with subject matter experts (SMEs) in relevant expertise areas, such as human centered design and program evaluation.

Technical Assistance provided by the Center should focus on helping build and maintain relationships across job functions, agencies, states and localities. One way to help deepen these relationships is to create designated spaces for peers across agencies to connect. These spaces enable collaboration on various aspects of projects across functions like program managers, data analysts, outreach leads, technology vendors, and other essential job functions.

In our CSNS cohort we host monthly meetings for the six funded sites to connect, share progress, and troubleshoot obstacles that arise in their work. We have received positive feedback that these sessions are helpful for generating new ideas and solutions to problems that could have held up progress. We have also worked alongside sites in the cohort to move their projects forward and observed that certain intra-state, cross-agency methods of collaboration strengthen outcomes. For example, the New Mexico CSNS project connected WIC and SNAP technology vendors in the form of regular meetings and design sessions, and these connection points have become essential to executing the project's plans to automate WIC referrals for adjunctively eligible SNAP applicants. These designated spaces for working together have been critical to the project's approach to co-designing new processes that work across agencies. To replicate this promising practice, the Center can help establish spaces and processes that facilitate connections across state and local agencies to amplify promising practices in real time.

In addition to offering assistance building and maintaining relationships across agencies within and across states and localities, the Center can deploy technical assistance to provide SMEs to help states incorporate human centered design and program evaluation into their planning and implementation. These points are further explained in sections below.

Project Management

Developing and maintaining project management materials such as project timelines and schedules, meeting agendas and minutes, and other logistical planning documents is essential to long-term success of projects and to the ability to continuously learn from experience, but these tasks can be laborious and time intensive. In addition, modernization efforts benefit from meeting facilitation services for cross-agency collaboration from conceptualization stages through evaluation. Other project management services that the Center could make available to WIC innovation efforts include resources and services that assist with process mapping and design to help with process alignment across agencies.

Flow charts and visuals that lay out processes across agencies can expedite critical phases of modernization efforts. For example, sites in the CSNS cohort have created visuals and flow charts for data sharing agreement approval processes, data exchange processes, and program-to-program referral processes. WIC agencies would benefit from the Center providing technical assistance with the development and customization of project management and process design resources like these.

Subject Matter Expertise

Certain projects and project stages involving innovation and new approaches to service delivery require specialized expertise, such as legal and compliance expertise to determine the parameters of data sharing allowed by agencies and to expedite contracts and agreements necessary to begin work. Other expertise areas that have surfaced as areas of need across the CSNS cohort and related projects include technical systems knowledge, human centered design expertise, and familiarity with outreach processes.

Two additional distinct needs that have emerged over the course of modernization projects include direct expertise navigating benefit programs and program evaluation proficiency. Because these are very common needs and generally pertinent to any modernization effort, we expand upon them in greater detail in the sections below.

Centering Participants in Program Modernization

The experience of facilitating the work of the six sites in our cohort has surfaced the importance of determining how participants will be meaningfully centered in program modernization efforts up front. Meaningful incorporation of equity principles means that the method of centering participants may look different based on the project; for example, an initiative focused primarily on data or technology modernizations will center participants in a different manner than a project that is testing human centered outreach. In the first initiative, participant-centered approach might look like strong data security protocol to protect privacy, while the second project's participant-centered approach could involve compensating program enrollees for participating in

a focus group about different outreach strategies. It is important that the approach to embedding equity in modernization efforts makes sense for the project and is carried out in a way that respects the time and expertise of individuals who have lived experience with financial and food insecurity. The Center should work with WIC agencies to help them modernize their WIC programs and improve the participant journey by ensuring intentional incorporation of equity principles and thoughtful integration of client perspective and lived expertise.

WIC agencies stand to benefit from opportunities to leverage human centered design in innovation projects. Human centered design principles can be useful for integrating perspectives of individuals with direct expertise navigating benefit programs through direct engagement with program participants and eligible individuals through surveys, questionnaires, focus groups, and other methods of gathering client insights from clients.

In addition to leveraging human centered design, there are many other ways WIC agencies and their peers in SNAP and Medicaid can center families in equitable program innovation. CSNS sites have explored hiring individuals who have lived experience with food insecurity, financial instability, and benefit program participation to lead aspects of their projects such as identification of common barriers to access, direct client engagement, and staff education on principles of equity, diversity, and inclusion.

By providing resources and services for onboarding, compensating, and supporting new staff who are contributing their lived expertise to the project, the Center can help ensure the WIC innovations that will be tested and established with new funding are set up to drive equitable program modernization.

Evaluating and Disseminating Promising Practices

More robust evaluation and tracking of innovation efforts across WIC and partner agencies is deeply needed. While some pilots have been evaluated through randomized control trials,¹ there is a need for more robust and longer-term studies to help understand why certain outreach interventions work better than others, whether process and policy changes impact various populations differently, and how to best serve priority populations.

For example, the Center might support evaluation by:

- Providing technical assistance setting up research study designs in various models, such as RCTs, time-bound pilots, geographic pilots, longitudinal studies, etc.;
- Helping agencies set up A/B tests for outreach interventions;
- Assisting with methods of capturing participant experience insights;
- Assisting with education on and hands-on support with data collection and analytics methods;

¹ Jess Maneely and Zoë Neuberger, “Using Data Matching and Targeted Outreach to Enroll Families With Young Children in WIC: Lessons Learned From State Pilots,” Benefits Data Trust and Center on Budget and Policy Priorities, January 5, 2021, <https://bdtrust.org/cbpp-bdt-case-study.pdf> and www.cbpp.org/wicpilotreport.

- Offering technical assistance on how to interpret findings and use them to inform future process and policy changes;
- Creating spaces to share key takeaways from ongoing efforts with peers; and,
- Compiling, synthesizing, and disseminating evaluations and research findings from the field to guide modernization efforts, which the Center could make available by publishing an annual report on state of WIC modernization across the state.

WIC agencies stand to benefit from support on program evaluation and studying impact of process and policy innovation pilots and endeavors to drive person-centered modernization of WIC in tandem with other health and human services programs.

Conclusion

APHSA and Share our Strength support the development of a resource center serving state and local WIC agencies and their improvement of the WIC application and certification journey. The Center can support effective and equity-focused modernization by collecting, cataloging, sharing, and promoting the reuse of best practices and solutions among WIC State agencies to help them address common operational issues that impact the customer experience.

The insights shared here are based on our observations from engaging in this work and our awareness of other related efforts. As a public health agency that is positioned differently in relation to other benefit programs like SNAP and Medicaid, WIC state and local agency needs will vary greatly across states. To identify additional priorities, we encourage the Center to engage in direct communication with state and local agencies to assess where they need external and federal level support in modernization efforts.

Business Information

About the American Public Human Services Association (APHSA)

The American Public Human Services Association (APHSA) is a bipartisan national membership association representing state and local health and human services agencies and the subject matter experts that help execute their mission to improve outcomes for people nationwide. Building on our long-standing relationships with health and human services leaders, APHSA advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.

APHSA's role and responsibilities as the Grant Administrator for the Coordinating SNAP and Nutrition Supports (CSNS) project include:

- Drive direction of the project by working hand-in-hand with states on project plans, implementation, and identifying best practices for cross-agency nutrition work going forward
- Uplift and disseminate lessons learned and best practices for the broader HHS community and national policy conversations
- Facilitate cohort learning and peer exchange
- Provide technical assistance to all grantees, including, but not limited to:
 - Utilize subject matter expertise in SNAP and human services to help guide direction of projects
 - Provide and acquire additional support for grantees from subject matter experts in data analytics, outreach methodologies, IT systems management, interoperability, infrastructure and contracts, and more
 - Host regular check-ins with each individual grantee

About Share Our Strength, No Kid Hungry

Since 1984, Share Our Strength® has led the fight against hunger and poverty by inspiring and organizing individuals and businesses to share their strengths. Today, through the No Kid Hungry and Cooking Matters campaigns, Share Our Strength is ending childhood hunger in America by ensuring all children get the healthy food they need.

Share Our Strength's No Kid Hungry Campaign is partnering with American Public Human Services Association (APHSA) to work together toward a collective goal of supporting systems change within SNAP-administering state agencies. The purpose of this project is to support critical work to end childhood hunger through the creation and support of a cohort of state agencies expanding access to SNAP and other government benefits programs. Share Our Strength's No Kid Hungry campaign will invest nearly \$2 million in six states to advance SNAP agency innovation and interagency coordination to combat childhood hunger.