Pennsylvania Department of Health
Bureau of Women, Infants and Children (WIC)

Comments for the Development of the FFY 2024 State Plan for the WIC Program
May 31, 2023

Introduction

Thriving PA offers these comments as a coalition of organizations serving and advocating for low-income women, infants and children in Pennsylvania. We share a common interest in promoting access to nutrition and healthcare for Pennsylvania families and recognize the tremendous benefits that the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides to its participants. Acknowledging the importance of WIC as a public health program, we have been concerned about the current participation rates across the state; however, we are encouraged by recent changes made by Pennsylvania’s WIC Bureau and have seen participation trending up in recent months. We hope to build on this progress to create a program that effectively serves all eligible Pennsylvania families.

While WIC participation had been declining for many years in Pennsylvania, the COVID-19 pandemic and the related challenges to accessing the program resulted in a large participation drop at a time when families were struggling. According to the posted data, participation decreased 17.66% from February 2020 to February 2022.¹ This trend runs counter to that of many other states where WIC enrollment increased to provide critical nutrition support in response to the ongoing public health and economic crisis. Based on the above USDA data, during the pandemic, 20 states and the District of Columbia had increased WIC participation and only two states had participation declines larger than Pennsylvania’s.² Despite this decline, over the past year the Pennsylvania Department of Health has been working extremely hard to improve the technology, services, and participant experience of PA WIC. We are grateful for the Department’s work, which has resulted in an increase of 5.75% from February 2022 to February 2023.³ We hope that this indicates an upward trend in WIC participation and hope to expand upon this momentum.

In addition to program improvements, PA WIC has made significant strides towards program transparency and partnerships with advocates and stakeholders. PA WIC’s policies and procedures are now posted online, as is monthly WIC participation data. Further, PA WIC has convened a Data Workgroup and members of the Department regularly attend and participate in various stakeholder meetings. We appreciate the steps that PA WIC has taken in the past year and the ways that program administrators have worked with advocates and stakeholders. We welcome the opportunity to offer comments for the development of Pennsylvania’s 2024 WIC State Plan, with the goal of increasing enrollment, maximizing consistent participation, and improving retention of

¹ https://www.fns.usda.gov/pd/wic-program
² https://www.fns.usda.gov/pd/wic-program
eligible participants so that they access the full benefits of the program. Our comments address three broad areas: technology improvements, cross program integration, and program modernization. We urge that the Pennsylvania WIC program implement these recommendations statewide to ensure consistency across the separate agencies administering the program.

**Technology Improvements**

**Online EBT System**

Pennsylvania’s offline EBT system is a major barrier to program participation. In a series of listening sessions conducted by Thriving PA, current and former WIC participants noted the difficulties caused by the offline EBT system, reporting that transportation to WIC offices during clinic hours was difficult, especially in rural counties.4

These issues were further highlighted by the COVID-19 pandemic. A report released by the Food Research and Action Center (FRAC) found that states with offline WIC EBT systems experienced a 7.6% participation decrease from February 2020 to February 2022, compared to a 3.9% increase in states with an online EBT system. This same report found that Pennsylvania was among the top five states with the largest participation decrease over the course of the pandemic.5

We are grateful that the Department recognized the offline EBT system as a hardship for participants and has taken steps to online benefit delivery. We also understand the importance of ending up with a permanent system that is functional for PA WIC participants. The current process of bringing the EBT system online is an example of how time consuming and expensive system changes can be, and we understand that the proper steps and vetting process must be undertaken to ensure that our future system supports increasing WIC participation for years to come. We urge the Department to prioritize this project to bring the system online as quickly as is feasible.

As the Department works to move to a fully online EBT system, they must create a system that includes modern security features that will protect WIC participants from having their benefits stolen, as has been occuring with participants of the Supplemental Nutrition Assistance Program (SNAP). SNAP participants throughout the country have had benefits stolen by individuals who place an illegal device on a retailer’s card-swiping machine to copy EBT card information.6 While the redemption, and thus the technology of SNAP and WIC benefits vary greatly, it is crucial that the

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new WIC system includes technology to protect participants from increasingly sophisticated means of theft.

Finally, we greatly appreciate that the Department has been transparent about the process of bringing the EBT system online with advocates and stakeholders, providing frequent updates and timelines.

User Friendly Mobile-App

As service providers to low-income families, we know that strategically offering user friendly digital tools can improve program participation and participant enrollment by giving families new opportunities to be connected to the program. In addition, “[d]igital tools offer a way to make the program easier for eligible families to navigate. Research shows that many WIC participants like using digital technology, both generally and as a part of the WIC experience, and would appreciate being able to connect virtually with WIC more often.”

We are thrilled that Pennsylvania WIC is taking steps to make the mobile-app more user friendly, including allowing participants to access their benefit balance, a change that has resulted in more families using and scanning foods through the app. As Pennsylvania moves to a fully online EBT system, the app should remain integrated with the EBT system so that participants do not lose this feature. We ask that further updates to the app be prioritized to allow for a simple user friendly interface, language access, and ease of use. Despite its useful functionality, many WIC participants are not aware of the mobile app. PA WIC should more comprehensively promote the app on the website, in local offices, and during visits and certifications with participants.

We feel additional online services, either through the PA WIC website or the mobile-app, would streamline clinic operations. We urge PA WIC to pursue eligibility screening and appointment scheduling as services offered online for WIC participants. Such features would allow families to fully access and utilize the benefits of PA WIC and reduce barriers that may cause participants to disenroll in the program. Additionally, these online services would help to offset the inconvenience of the current offline EBT system while the Department continues the process of moving to an online system.

Electronic and Mobile Documentation

We further recommend that the WIC program accept electronic and mobile-app-based documentation, such as pay stubs on an applicant’s phone, from those applicants for whom income documentation is necessary. Similarly, if the participant does not have income documentation, we

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8 WIC Stakeholder Collaborative Monthly Meeting, Department of Human Services, March 2023
9 Making WIC Work Better: Strategies to Reach More Women and Children and Strengthen Benefits Use,”, Food Research and Action Center,
recommend that the program use electronic data sources used by DHS, e.g. TALX or The Work Number, to determine income from those employers who participate. We understand that PA WIC is making updates to PENN, the management information system, that will allow for updates like online document submission. We appreciate the Department prioritizing this process and encourage them to pursue integration between PENN and electronic data sources mentioned above once this update goes live.

**Cross Program Integration**

**Multi-Program Application**

We understand that Pennsylvania does not presently share a common application or certification form with other benefit programs, although federal regulations permit this. We are glad to hear that the Department is interested in pursuing integration between COMPASS and WIC, for example including a checkbox on COMPASS that would send information directly to WIC. Certainly any amount of integration between COMPASS and WIC would create an easier process for families to get connected to the program. We would strongly recommend, however, that the WIC pre-application be added to the COMPASS website and to paper applications. We recommend that both the online and paper application process screen individuals for WIC eligibility based on income and category, alert applicants to potential WIC eligibility, and send the applicant's eligibility information automatically to WIC. In addition to a common application, we recommend that programs like SNAP and WIC be cross-promoted at local offices.

**Adjunctive Eligibility**

Per federal and state regulations, people are adjunctively income-eligible for participation in WIC if they participate in SNAP, MA or TANF. This is an important group to try to identify and enroll in WIC because these families have already sought out assistance. WIC builds on the health and nutrition support provided by SNAP, MA, and/or TANF, and adjunctive eligibility simplifies the enrollment process. We were pleased to see adjunctive eligibility mentioned as one of the goals and objectives for functional areas in the FFY 2022 State Plan. The goal to “[i]ncrease participation

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https://frac.org/research/resource-library/making-wic-work-better-strategies-to-reach-more-women-and-children-and-strengthen-benefits-use, p 51 (“WIC should offer clients the option to submit documentation to local agencies via digital technology.”); 50 (“State agencies should make the program more attractive and conducive to participation by offering mobile WIC applications”); Launching New Digital Tools, 7 (recommending that agencies use mobile apps, websites, or text message reminders to submit income/residency documentation).

10 2022 State Plan, Part VII (Certification, Eligibility, and Coordination of Services), A(1)(b).
by utilizing MOU with DHHS for sharing adjunctive eligibility data” is a common sense goal to ensure that additional WIC eligible families are identified and enrolled in the program.\footnote{2022 State Plan, “Goals and Objectives for Functional Areas” VIII (1).}

Applicants who are adjunctively income-eligible should not be required to provide additional income documentation, nor should documentation be required to prove participation in those programs when the data is electronically available. PA WIC Policy allows local agencies to confirm an applicant’s eligibility to SNAP, MA, or TANF using CIS, a process that confirms eligibility without putting the burden on the applicant.\footnote{PA WIC policy 3.02(C)(4)(d).} PA WIC policy also states, however, that adjunctively eligible applicants “should be encouraged to provide proof of income as required of all other WIC applicants.”\footnote{PA WIC policy 3.02(C)(4)(d).} This policy puts the burden of confirming eligibility back on the applicant. Furthermore, this policy is vague and may be applied unevenly across local agencies. As income eligibility can be confirmed through CIS, the practice of encouraging applicants to provide additional documentation is unnecessary and may be a barrier for families trying to access WIC services.

At present, the PA WIC program’s online pre-application directs all applicants to bring income documentation to the WIC office.\footnote{See WIC Pre-application: https://www.pawic.com/OnlineApplication.aspx} Instead, it should state that applicants who participate in SNAP, MA or TANF, or whose WIC-eligible child participates in one of those programs, do not need to provide income documentation. Similarly, hard-copy materials distributed by WIC offices should plainly state that applicants who participate, or whose child participates, in SNAP, MA or TANF, are not required to provide income documentation to the WIC office. In addition, adjunctively-eligible applicants should not be required to provide additional residency documentation, because participants in SNAP, MA or TANF have already established their residence in Pennsylvania. At the recertification stage, we also recommend automatic electronic determination of participation in SNAP, MA or TANF, and we recommend that such participation be accepted as sufficient to meet eligibility criteria for income and residency.

**Coordination with Medical Providers**

Better care coordination between pediatric offices and WIC clinics would decrease the burden on families to provide weight, lab results, and other data that their health care provider recently acquired. This care coordination would also allow health care providers to have a complete understanding of their patient’s current and historical health care. Due to the need for telehealth throughout the pandemic, robust systems of technology are currently in place to help patients at all levels of the medical system access services remotely. We urge the Department to utilize existing services to better streamline participant care between WIC and medical services.
Program Modernization

Remote Services

Throughout the pandemic, Pennsylvania WIC has done an excellent job of utilizing available waivers offered by the USDA to allow flexibilities for WIC clients. Flexibilities such as the waiving of the physical presence requirement, food package substitutions, and remote benefit issuance allowed participants to access WIC safely during the pandemic. Additionally, PA WIC creatively utilized tools such as drop boxes to help WIC clients access benefits remotely given the constraints of the offline EBT system. The waivers previously available through the Families First Coronavirus Response Act (FFRCA) will only be available until August 9, 2023, however the USDA has announced new waivers that will allow states to continue to waive the physical presence requirement and provide remote benefit issuance until September 2026. We would ask that the department pursue both of these waivers for the full time period in which they are available. Such waivers will allow participants to access services with maximum flexibility, which will assist Pennsylvania’s goal of increasing participation and retention.

As PA WIC pursues waivers that allow the program to provide additional flexibility to participants, we urge the Department to clearly communicate about waivers and policy changes to local WIC offices. Local offices are often busy and understaffed, and it can be easy for them to miss or misinterpret policy changes while managing an overwhelming workload. We advise the Department to communicate about policy changes more than once to local offices and send frequent reminders and updates as information changes or deadlines approach. We further recommend that the Department communicate to local offices in more than one way, for example, by email and by mailing a letter.

Strengthen the Workforce

WIC staff can make or break a participant’s experience in the program. In the Thriving PA WIC listening sessions, participants pointed to both successes and challenges with their WIC clinic experience. One participant said their local WIC office was “off the chart amazing” and had “great communication”. Other participants spoke about issues such as lack of clarity around when a child should be present for an appointment or what documents to bring. WIC staff are crucial to making sure that the WIC experience is clear, smooth, and respectful for WIC participants. To this end, PA WIC needs to provide equitable pay in order to maintain staff and reduce turnover. We recommend that the Department develop a wage-scale for clinics to establish an expectation for fair and adequate salary ranges. Additionally, workforce development, including increasing the diversity of WIC staff and preparing the workforce to service more culturally diverse families, is essential to modernizing WIC and equitably improving services. In order to adequately serve the range of WIC

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19 Flexibilities to support outreach, innovation, and modernization, USDA Food and Nutrition Service, April 2023
20 WIC Participants Encourage Improvements
families throughout the state, staff should reflect the diversity and experiences of WIC families. Further workforce development includes cultural competency and equity training for all WIC staff and WIC vendors to build a culturally sensitive workforce, as well as to hire bilingual staff and provide clear and accessible translations of WIC materials.

**Modernize outreach methods to capture more participants & partners**

Effective outreach can help improve eligible families’ access to information about how to apply for WIC and help debunk myths, misconceptions, and outdated notions about WIC. For example, some community members aren’t aware that WIC is still operating, or view it as an outdated program. Other individuals feel stigma when enrolling in the program or harbor questions and misconceptions about how the program operates. Additional outreach efforts are needed to improve eligible families’ access to information about WIC and correct misinformation.

The state should explore more modern methods of outreach such as texting or social media. The recent effort to send text messages to potentially eligible families in partnership with the Pennsylvania Department of Human Services, which resulted in over 1000 pre-applications in a single month, is a perfect example of how effective modern outreach efforts can be. We recognize that local WIC offices have limited resources, including financial resources, and are unlikely to have the resources to pursue modern outreach on their own. We ask that additional marketing be undertaken at the state level to effectively reach potential participants on a large scale across the state.

The recent texting project was undertaken in collaboration with the Department of Health, Department of Human Services, and a small working group of engaged WIC stakeholders. This is a perfect example of successful collaboration among multiple levels of the program, and we encourage the Department to retain this model as they explore additional outreach opportunities. The Department should also include WIC participants in the outreach process. When outreach efforts have input from a variety of stakeholders, including participants, the messaging is likely to be useful, culturally appropriate, and understandable. We encourage the Department to prioritize language access as they undertake additional outreach, with the understanding that individuals who speak English as a second language may experience additional barriers in connecting to the program.

**Comment Process**

We recognize and celebrate the ways that PA WIC is already working to gather participant and stakeholder feedback through the 2023 multi-platform comment process. This year, PA WIC is seeking public comment through in person sessions, virtually, over the phone, via text, or through mail. A robust comment process ensures that participants and stakeholders with a variety of needs, lifestyles, and barriers to participation, can offer feedback to the Department. The state has been proactive in disseminating this information to stakeholders, for example through the WIC Advisory

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21 WIC Participants Encourage Improvements
The Department should undertake more rigorous public outreach for public comments, utilizing local WIC offices, social media, texting, and the PA WIC website, among other methods. We would also urge the Department to begin publicizing the comment period and sessions earlier, particularly with in-person sessions being offered. Participants and stakeholders may need to arrange childcare or transportation to attend a session and should be afforded ample time to do so.

**WIC Retailers**

Finally, we assert that access to WIC retailers is crucial for WIC participants to meaningfully utilize their benefits. The lack of retail options for redeeming WIC has created strains for WIC participants. In particular, COVID-related interruptions to transportation and supply chain issues highlighted how difficult it is for many participants to both find an accessible WIC retailer in their area and to reliably find their approved WIC food package items available. The Thriving PA WIC Participant Brief revealed that participants in both urban and rural areas had difficulty accessing WIC retailers and expressed frustration with determining what items were WIC eligible in the stores. PA WIC should look to strengthen ties with retailers - improving technical assistance and easing burdens to being a WIC retailer when possible. Such options include loosening the hours requirements and reducing stocking requirements for stores of lower square footage and fewer registers. In addition, stores should be supported in efforts to have more clear signage for WIC-approved foods and more adequate stocking of WIC-eligible foods so that participants are able to fully use their benefits. Finally, WIC participants would also have improved shopping experiences if self-checkout were made available.

**Conclusion**

We appreciate the opportunity to provide these comments, as well as the more open lines of communication PA WIC and this group have developed thus far. We hope to continue to build a strong partnership and would welcome the opportunity to discuss these comments further.

Signed,

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23 WIC Advisory Listserv Email sent by RA-DHWICADVISORY@pa.gov on May 16, 2023.
24 WIC Participants Encourage Improvements, 5
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