

Appendix N
Public Comment Submission 1

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As a former state and local agency WIC employee (for 10 years), I know that the records required are essential for FNS to ensure program integrity. However, the requirements for document retention (specifically paper-based records) is confusing as written in the CFR, and is substantially burdensome on local agencies. Additionally, the state plans are exceedingly burdensome on state agencies. FNS allows flexibility in the format that states submit their state plans and in the data requirements from the MIS, under the guise of allowing state-by-state individualization and customization. Unfortunately, such individualization greatly increases the reporting burden for the state agencies, and also presents a substantial burden on the FNS regional offices for reviewing plans and policies that differ from state to state.

To reduce the burden on all parties (and therefore the cost, in human capital and salaries), FNS must standardize all aspects of the state plan. Standardization is the only way to improve efficiency and reduce costs. This would include policies, goals/objectives, the nutrition services state plan, data, and all aspects that should be the same across states. It would be best if this was done nationally, but regionally would be a good start.

Additionally, the state plan should be a 5- or 10-year plan, with simple review of progress and changes to goals annually. State agencies spend a colossal amount of time and money doing these state plans each year, taking staff and resources away from implementing the actual plans. As those of us who work in public health know, all resources (time, human, skill, money, etc.) are limited. Moving resources onto the state plan means that the same resources cannot be used to implement the plan itself. In my experience at a state agency, we spent more than 6 months preparing our state plan. This is more than half of the year - time we were supposed to be implementing the present year's plan, yet also reporting on its outcomes at the same time. If FNS continues to expect such a heavy input of resources each year, FNS must commit to funding additional positions at the state level to complete these tasks.

The administrative burden of the state plan also prevents innovation in the WIC program because program leaders' bandwidth is taken up by the state plan and its cumbersome, repetitive requirements. I witnessed a state WIC director saying that they were not going to implement the ARPA waivers because they had to focus on their state plan. With the state plan looming each August, how can FNS ever expect agility, innovation, or even decent services from its WIC agencies?