

Maximizing WIC's Role in Supporting Health, Food Security, and Safety During the COVID-19 Pandemic: Opportunities for Action

During the coronavirus (COVID-19) pandemic, it is crucial to preserve access to the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) food benefits, nutrition and breastfeeding support, and referrals to services. The COVID-19 virus is negatively impacting public health and the American economy, creating significant challenges for low-income people: social distancing strategies decrease work opportunities; families who are already struggling to meet daily food needs do not have the resources to stockpile food and other supplies; and school and child care closures reduce access to meals. The number of people who are eligible for WIC is increasing due to the loss of family income. There are actions that WIC, advocates, partner organizations, and State and local policymakers can take to help preserve access to WIC during this pandemic.

When there is a declaration of emergency, such as the COVID-19 pandemic, WIC can employ special waivers to help WIC clients and those who are newly eligible to get timely access to WIC benefits and services. ^{1,2} The U.S. Department of Agriculture (USDA) can provide these administrative programmatic flexibilities when a request is made by a State WIC agency. For this reason, State WIC agencies need to act quickly to request a full complement of waivers.

The recently passed Families First Coronavirus Response Act further expands USDA's authority to waive administrative requirements that are barriers to serving WIC participants during the coronavirus outbreak. It also specifically allows waivers for WIC to certify participants without being physically present at a WIC clinic, and defers height, weight, and blood work requirements that are necessary to determine nutritional risk.

State Governors and other policy makers implementing plans to deal with the COVID-19 virus should classify WIC as an **essential** public health service. To the extent possible while operating within CDC guidelines, these plans should preserve access to WIC and not unilaterally close down all WIC clinics without alternative service options in place.

The time is now to take action, starting with the recommended strategies below.

- Conduct WIC outreach through networks and communities.
- Eliminate the requirement for a client to be physically present at a WIC clinic (e.g., offering remote enrollment and recertification).
- Extend WIC certification periods and simplify enrollment when necessary.
- Employ options for flexibilities in WIC food package redemption, minimum stocking requirements, and benefit issuance.
- Coordinate referrals to services.

Opportunities for Action

Advocacy organizations, other partners, and WIC should widely disseminate information about WIC services and special policies during the COVID-19 pandemic. Health, social service, early childhood education, school, advocates, and community partners should include WIC outreach in their communications to parents and communities. Advocates can facilitate access to WIC during this time by fully utilizing their networks to share WIC's toll-free numbers, websites, apps, enrollment portals, and any special policies to facilitate access to WIC benefits (e.g., offering virtual or remote enrollment or flexibilities for food redemptions). Organizations can integrate WIC information and messages into their websites, hotlines, social media, media, community outreach channels, and other pandemic-related resources.

State and local anti-hunger organizations can help identify barriers and facilitators to WIC participation during this health crisis, and make recommendations for waivers, policies, processes, and partnerships. Advocates can offer State and local WIC agencies recommendations and to facilitate feedback from relevant stakeholders (including from leaders, such as representatives from communities and groups served by WIC, parents participating in WIC, and parents made newly eligible by the COVID-19 pandemic). State and local agencies may have specific requests for assistance from partners. For example, one organization is working with their county public health directors to organize food distributions from WIC clinics. They are discussing plans to create a system that is consistent with social distancing, such as setting up a text system that allows families to connect for an individual receipt of food rather than standing in lines.

State WIC agencies should use the State WIC toll-free phone number, website, texting systems, and social media to help WIC clients determine opportunities for enrolling in WIC, and to keep updated on WIC's COVID-19 policies. State and local WIC agency COVID 19 communications should be issued in the primary languages used by WIC applicants and participants.

State and local WIC agencies should waive the requirement for clients to be physically present for enrollment and recertification in WIC during the COVID-19 health crisis. WIC participants should have the option to enroll or be recertified remotely via the internet, phone, or virtually through commonly available video chat functions (such as Face Time, Skype, or public health telehealth systems). As per the Human Pandemic section of USDA's 2017 *Guide to Coordinating WIC Services During Disasters*, "State Agencies may not be able to certify applicants for WIC at application/issuance sites or at local WIC clinics due to restrictions on social gathering, and will need to operate under alternate procedures." In addition, the Families First Coronavirus Response Act specifically grants USDA the authority to allow WIC agencies to certify individuals without their being physically present in the WIC clinic. The Act also allows USDA to defer the height, weight, and blood work requirements necessary to determine nutritional risk. WIC will need to employ this option in order to make off-site enrollment or recertification viable for clients. Normally, most clients rely on WIC to measure height and weight and to conduct blood work, this may not be possible during the current crisis.

State and local WIC agencies should utilize options to extend certification periods and streamline income eligibility. WIC can shorten or extend WIC eligibility certification periods by up to 30 days to streamline the WIC certification process to get newly eligible participants in the program, or extend WIC recertification due dates by 30 days to avoid creating unnecessary hardship on current participants. Under the expanded waiver authority in the Families First Coronavirus Response Act, State WIC agencies can extend certification periods to avoid creating unnecessary hardship on current participants during the COVID-19 pandemic. This is crucial to accommodate the social distancing requirements being implemented to reduce the spread of the virus.

WIC should streamline income eligibility using automatic income eligibility for applicants who are newly enrolled in the Supplemental Nutrition Assistance Program (SNAP), potentially including Disaster SNAP (D-SNAP) if it is offered in response to circumstances caused by the COVID-19 virus. If necessary, by using an emergency waiver, WIC can simplify eligibility procedures by allowing families to qualify for WIC by signing a "self-declaration" form to demonstrate that they are income eligible. This would include electronically "signing" the form.

These options can also streamline the workload for WIC staff during the COVID-19 pandemic, potentially allowing them to meet the increased need for WIC with a reduced staff, and transition to virtual services.

State WIC agencies should employ options for flexibilities in WIC food package redemption, relax minimum stocking requirements, and maximize benefit issuance. For WIC shoppers in stores with reduced stock due to the COVID-19 health crisis, WIC can allow substitutions for missing items offering flexibility in the following categories:

- types (e.g., allow full-fat or non-fat milk if non-fat milk is not available; and allow canned fruit and vegetables in states that currently only fresh and frozen produce);
- brands (e.g., allow available brands that meet the WIC nutrition standards); and
- sizes (e.g., allow any sized loaf of whole-grain bread available instead of WIC's federal requirement for a one-pound loaf of bread) of WIC foods.

Flexibility regarding food choices and minimum stocking requirements allow WIC shoppers and retailers to maximize food package choices when food supply chains are overburdened and disrupted by the current health emergency. WIC agencies and WIC vendors need protection against being found in violation of the WIC stocking requirements if insurmountable barriers to stocking certain items occur during this time. Stores need to be willing to continue redeeming WIC in order for WIC shoppers to be able to fully utilize their benefits.

Continuing to receive WIC benefits should not be dependent on completing nutrition education visits or modules during the COVID-19 pandemic. WIC should continue to offer nutrition education but not make completing it a condition of receiving the next month's benefits downloaded on the WIC EBT card or the next set of paper vouchers.

WIC can already provide up to three months of benefits in advance. In some circumstances, it may become necessary to allow WIC clients to start spending the next month's benefits early to stockpile food. This would require a waiver.

Relevant agencies and WIC should coordinate to offer referrals for needed services. In response to the COVID-19 pandemic, WIC can fulfill its important function of connecting participants to services by making referrals to SNAP, Child Nutrition Programs meal pick-up and delivery sites that are instituted in response to school closures, and emergency food distribution options. SNAP agencies, schools, colleges, and emergency food providers can refer clients to WIC.

State WIC Agency Disaster Plans: USDA strongly encourages State WIC agencies to prepare disaster plans to ensure the continued delivery of WIC benefits and outreach to potential newly eligible individuals in the event of an emergency. However, not all states have a plan. USDA's *Guide to Coordinating WIC Services During Disasters* (https://www.fns.usda.gov/disaster/guide-coordinating-wic-services-during-disaster) is an important resource for WIC and partners working to respond to increased needs as a result of the COVID-19 virus.

Resources

USDA's Food Program Guidance on Human Pandemic Response website: https://www.fns.usda.gov/disaster/pandemic#automatic

FRAC's website about the COVID 19 pandemic: https://frac.org/blog/preparing-for-the-impacts-of-the-coronavirus-on-health-well-being-and-food-security

Note: It is important to mention that this is a rapidly evolving situation. FRAC will continue to update this document to reflect new developments.

Endnotes

¹ Garnett, S. (1995). WIC Policy Memorandum 95-9: WIC Disaster Policy and Coordination (February 24, 1995) and WIC Policy Memorandum 95-9A: Revision of WIC Disaster Policy and Coordination (December 29, 1995). U.S. Department of Agriculture, Food and Nutrition Service.

² U.S. Department of Agriculture. (2017). *Guide to Coordinating WIC Services During Disasters*. Available at: https://fns-prod.azureedge.net/sites/default/files/resource-files/WIC-Disaster-Guidance.pdf. Accessed on March 17, 2020.