

SUMMARY REPORT

**Special Supplemental Food
Program for Women, Infants
and Children (WIC)**

**Commodity Supplemental
Food Program (CSFP)**

**United States Department of
Agriculture
Food and Nutrition Service**

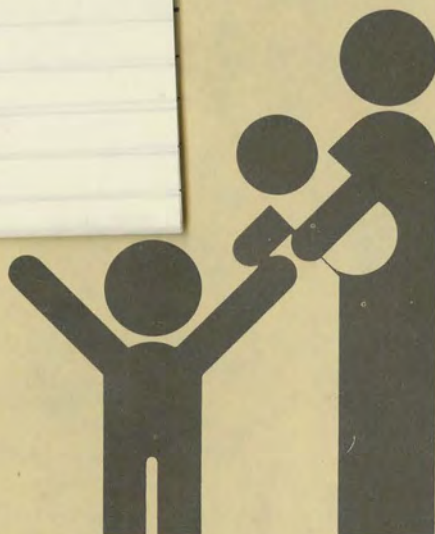
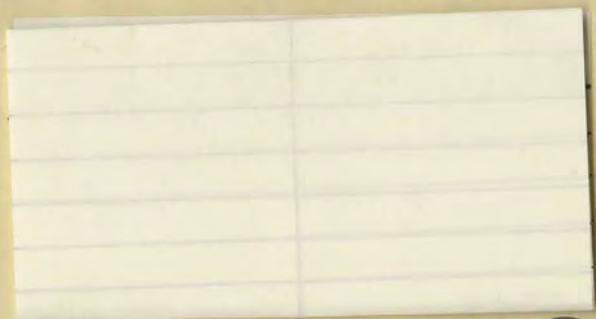
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SUMMARY REPORT
FIRST NATIONAL STATE DIRECTORS MEETING
ON PROGRAM MANAGEMENT



Our appreciation is extended to the workshop
leaders who submitted reports on their sessions.

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INTRODUCTION

In our Nation, malnutrition and inadequate maternal and infant health care are two of the most serious problems affecting low-income pregnant women and infants. During prenatal development and the first few years of life, sufficient and appropriate foods and the availability of proper health care are essential to healthy physical and mental development. Denial of either proper nutrition or health care can have serious consequences for the future growth of an infant. Such denial can make the distinct difference between a healthy, productive life or an unhealthy, non-productive existence. The United States Department of Agriculture (USDA) provides funds for two programs specifically designed to attack nutrition problems in children and in pregnant or postpartum women: The Commodity Supplemental Food Program (CSFP); and the Special Supplemental Food Program for Women, Infants and Children (WIC Program). Each is briefly described below.

The CSFP provides supplemental foods to low-income pregnant and postpartum women, and to children under six years of age. In fiscal year 1979 the CSFP served approximately 100,000 needy individuals monthly. The Program is administered by various State Departments and is operated out of local health or service agencies. The foods provided under the CSFP are purchased by USDA and distributed to the States. The food package currently includes infant formula, evaporated milk, corn syrup, powdered milk, dehydrated potatoes, cereal, egg mix, peanut butter, canned meat or poultry, juice, and canned vegetables and fruit. The commodities are stored at warehouses and distributed directly to participants. Many participants prefer the CSFP because it offers a wider variety of foods than does the WIC Program. Nutrition education is provided at the local agencies.

The WIC Program provides supplemental foods to low-income pregnant and postpartum women, and to children under five years of age, who are determined to be at nutritional risk. In fiscal year 1979 the WIC Program served approximately one and a half million needy individuals monthly. The WIC Program is administered by State Health Departments and Indian tribes, and is operated out of local health and service agencies.

Most WIC participants obtain foods at local grocery stores by presenting a voucher for specified food products which are prescribed to meet their nutritional needs. Foods provided through the WIC Program currently include milk, cereal, juice, eggs, cheese, and infant formula. Health services may be provided either by the local agency or by another agency or physician under contract to the local agency. Nutrition education is provided at the local agencies. The combination of supplemental foods, health care and nutrition education make the WIC Program extremely effective in the prevention of health problems.

Purpose of National Meeting

The administrative structures of the two programs are very similar. At the national level, the Supplemental Food Programs Division of the Food and Nutrition Service (FNS) has the responsibility for both programs. Each program is administered by a division of State government and at the local level by a health or service agency. Those of us at USDA who work on these programs believe that greater coordination between agencies at the State and local level would be extremely helpful in improving administration and the delivery of benefits. Many of the problems faced by the State agencies are similar, and knowledge of innovative approaches developed by one State can be of enormous benefit to other States. Many State agencies are knowledgeable about programs in various parts of the country, and States within the same geographic region do meet periodically to discuss common problems. However, administrative personnel from different regions of the country benefit from expanded opportunities for the mutual exchange of information among the people involved in administering the Program at the State level. Therefore, a national meeting was sponsored by USDA on December 3-5, 1979, in Albuquerque, New Mexico. Attendees included the State Directors of the WIC and CSF Programs, members of the National Advisory Council on Maternal, Infant and Fetal Nutrition, Federal government personnel, and representatives of Native American Tribes and of advocacy groups.

The purpose of the meeting was to enable the various State Directors and others in attendance to learn more about the operations of programs in other States. Workshops were held in which the participants could exchange their experiences and ideas. Another goal of the meeting was to give USDA personnel a better sense of the State agencies' concerns and to listen to suggestions for improvements which could be made at the national and regional levels.

This publication attempts to summarize the speeches given, the ideas shared, and the recommendations made at the various workshops held at the First National WIC and CSFP State Directors' Meeting on Program Management.



THE WHITE HOUSE

WASHINGTON

November 28, 1979

This nation's children are our most precious resource. The future of our country lies ultimately in their hands and they shall be the final judge of our determination to give them every opportunity to become healthy, competent, caring members of our society.

But, as you all know too well, there are many children who we have already failed, who will grow up in this affluent nation permanently disadvantaged because of the lack of proper nutrition or adequate health care at an early age.

It is a great pleasure for me to recognize you who are involved in programs which are on the front lines in the fight to raise the nutritional status of young Americans. The Special Supplemental Food Program for Women, Infants and Children and the Commodity Supplemental Food Program have demonstrated their success in improving the health and nutrition of mothers and children in America.

I salute you for your outstanding accomplishments and urge you to bring the same dedication that has marked your efforts in the past to the operation of these vital programs in the years ahead.

Rosalynn Carter

Department of Agriculture
National State Directors Meeting
Supplemental Food Programs
Albuquerque, New Mexico



EXCERPTS FROM SPEECHES OF USDA OFFICIALS

Carol Tucker Foreman - Assistant Secretary of Agriculture
for Food and Consumer Services

I am happy to be here today to express to you, in the strongest possible terms, the Carter Administration's unwavering commitment to both WIC and the Commodity Supplemental Food Program. Secretary Bob Bergland believes that they are among the highest priorities in the entire department. He believes, and I concur, that they should rate the same high priority in the Federal government as a whole.

Ten or fifteen years ago all you had to do to get money for a social or health program was to say, "it is needed for a good cause." That statement made, everyone jumped. Today it is different. Many good programs go unfunded and needy causes go unmet because we worship at the altars of balanced budgets and cost/benefit analyses.

WIC and CSFP programs are good programs, meeting a great need. They also meet the needs of today's budgetary concerns. They are demonstrably health effective and cost effective.

A considerable body of evidence shows that WIC has significant and positive effects on the outcome of pregnancy and that WIC favorably influences infant development. The programs you administer reduce infant mortality rates, and help prevent severe birth defects, chronic ill health, and subnormal development.

Studies Cited on Effectiveness of WIC Benefits

The Center for Disease Control studies found:

- Children enrolled in WIC for one year showed considerable improvements in blood values.
- Children with lowest hemoglobin and hematocrit values showed the most improvement.
- Children with low weight for height grew significantly during the first six months of participation.
- Strong evidence suggests that the incidence of low-birth weight babies is substantially reduced if mothers participate in WIC.

Additional studies reported:

- In Michigan - Participation in WIC reduced the percentage of anemic women in the caseload from 30 to 6 percent.

- In Oregon - Participation in WIC reduced the percentage of anemic children in the caseload from 13 to 1 percent.
- In Pennsylvania - Participation in WIC reduced the caseload infant death rate from 10.6 percent to zero. Immature birth rates decreased from 12.8 to 1.6 percent. Pregnancies with complications were reduced from 30.9 to 17.6 percent.
- In Montana on seven Indian reservations - Participation in WIC reduced the infant mortality rate from 31.5 per thousand to 16.6 per thousand.
- In Arizona - WIC participants recorded an 81 percent reduction in anemia, an 82 percent reduction in underweight, and a 64 percent improvement in stature. The Public Health Service Indian Hospital in Tuba City treats far fewer children for severe nutritional diseases than it did a decade ago.

A study by the Yale Medical School and the Waterbury, Connecticut Health Department found dramatic reductions in infant mortality rates as a result of WIC.

WIC Is Also Cost Effective. WIC does more than just meet health needs effectively. A study conducted at the Harvard University School of Public Health found that each \$1 spent on pregnant women in the WIC Program results in a \$3 savings in later hospitalization costs for low birth weight babies.

Dr. Eileen Kennedy, one of the authors of that Harvard study, and Dr. Sandra Huffman, who was recently named Chairperson of the Subcommittee on Nutrition and Fertility of the National Academy of Sciences, are now employed by FNS on our Policy, Planning and Evaluation staff.

These two women and others on the policy staff have just completed an analysis of cost-benefit ratios in the WIC program. Their analysis shows that WIC's role in helping to prevent birth defects, chronic ill health, and subnormal development, not only enables individuals to live healthier, more productive lives, it also averts major medical expenditures and reduces a later need for special assistance programs, such as Medicaid, SSI, and Special Education. The analysis finds that the prenatal component of the WIC Program will cost \$150 million in fiscal year 1980.

That sounds like a lot of money. It is a lot of money. But the expenditure of that \$150 million will result in a total savings of \$550 million in medical and special assistance costs which will have been averted. The \$150 million spent on WIC also results in a federal savings of \$260 million in reduced Medicaid, SSI, and Special Education costs. These savings are probably understated since several benefits were not included

in the computations. Based on conservative estimates the savings from the WIC Program -- in decreased medical costs, decreased assistance payments, and increased earnings resulting in increased tax revenues -- are greater than the costs of the entire WIC Program for 1980.

I don't believe there is any federal program that can equal WIC's record for effectiveness, efficiency, and compassion -- all the things that President Jimmy Carter, and, I'm sure, everyone in this room, believe that government should be. These are also the reasons why we are committed to continuing WIC growth in the years ahead.

WIC Food Package Proposed Rules

After perhaps the longest pregnancy in history, the proposed regulations for the food package have finally been delivered -- and published. The gestation period was long and the birth was difficult for a number of reasons. Every effort was made to get all the relevant issues and opinions expressed in advance and as you know, on this subject there are a lot of opinions. The task was further complicated by these three factors:

- Nutrition is a complex and constantly changing science and there are gaps in our nutritional knowledge.
- As a result, there is little agreement on answers to what should be in the WIC food package. There isn't even unanimity on what questions should be asked.
- People, especially people at high nutritional risk, are not nutritional clones. There is not one perfect diet which will ensure good health, long life, and an end to hives and the common cold.

The new regulations attempt to deal with these problems. They propose tailoring the amount of food issued to the different ages and nutritional needs of participants. The three current food packages would be replaced with seven. They divide infants and children into four age groups, and then deal separately with children with special dietary needs, pregnant and breastfeeding women, and postpartum women.

The food package proposals have six major objectives.

- (1) They reflect more accurately the infant's developmental needs and pediatric feeding recommendations.
- (2) They correspond more closely to the recommended eating patterns for pre-school children.
- (3) They meet the additional nutritional requirements of pregnant and breastfeeding women, and encourage breastfeeding.

- (4) At the option of the competent medical professional, they reduce the amount of iron required in cereals for participants who are not anemic.
- (5) They limit sugar in cereals.
- (6) They explore the option of including vegetables and whole wheat bread in the package in the future.

I want to emphasize that these are proposed regulations. We need to hear from you about them. You are the people who are out there, every day, living with the problems, and dealing with them. We want your comments. We need your help to make the final regulations the very best that can be devised. Better to take the time now than have an administrative nightmare later.

Commodity Supplemental Food Program

I want to lay to rest, if I can, the perception that CSFP is a stepchild of the supplemental food programs, and that we at USDA give it lip service, but little else. It's true that we don't have the same data for CSFP as we do for WIC. But that's not due to lack of interest. It's due to lack of legislation. And we are very interested in hearing the results of Dr. Al Mauer's evaluation of the CSF Program at St. Jude's Hospital in Memphis during your evaluation panel session.

When the WIC legislation was enacted, some people thought CSFP would die. That didn't happen and won't happen. And the reason it didn't and won't, is because of the tremendous local support for the program where it exists. I reaffirm to you our belief that both WIC and CSFP have unique functions and both make unique contributions to the people we are trying to help.

I'm sure you know that we are in the process of revising the CSFP regulations. Again, we need to hear from you. Now is the time to be thinking about where the program should go in the future. Do we need additional legislation? Should the program be more structured? How about connections to health care and nutrition education? How can CSFP and WIC mesh better in areas where they exist cheek by jowl? Or should they? How should CSFP administrative funds be calculated? Should they be based on the value of the commodities? And if so, which value? USDA's or the retailer's price? Or should they be allocated based on a flat percentage of the funds allocated for the program? Your answers to these questions, or your opinions on whether they are even the right questions, are crucial to a sound, effective program.

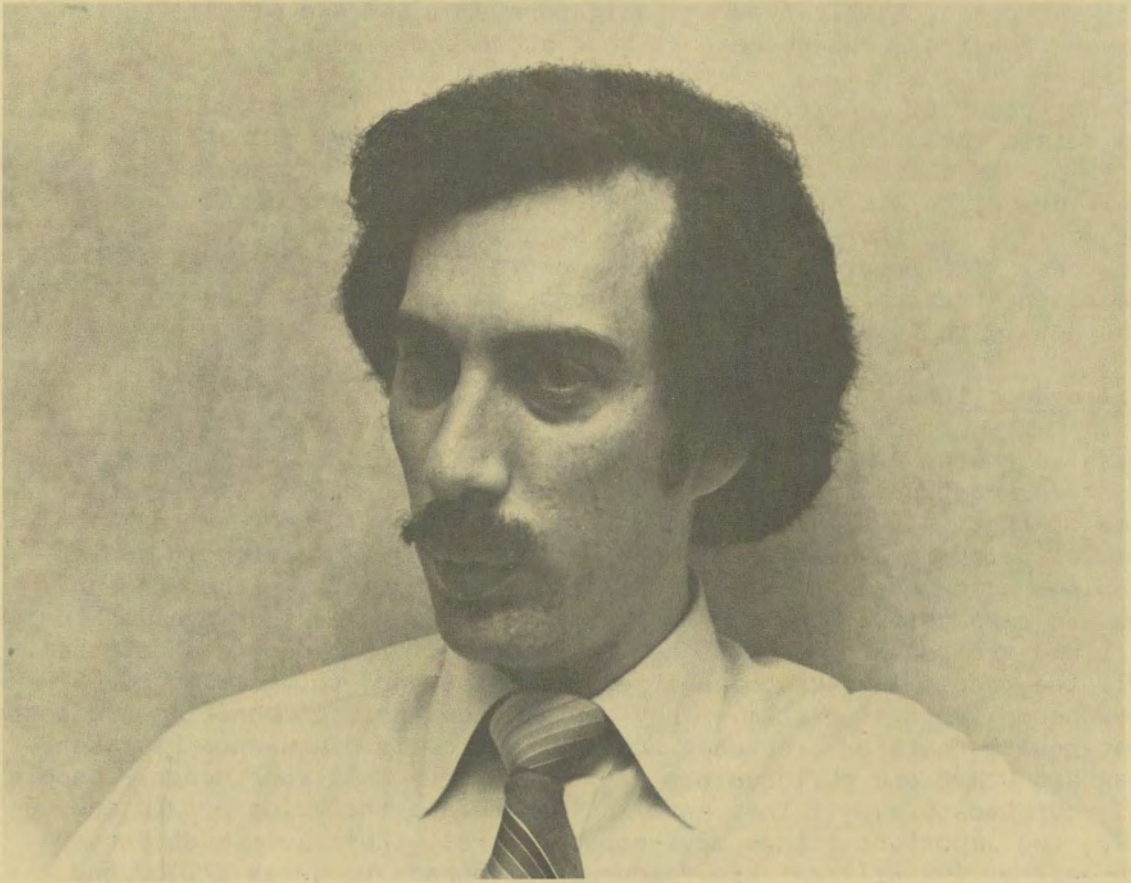
Program Funding

The message I came to bring is one of strong unqualified support for both WIC and CSFP. These programs have had the strong support of this Administration. In a time of very tight budgets, when funding for many programs is being cut back, President Jimmy Carter, Secretary Bob Bergland, and FNS Administrator Bob Greenstein have found scarce dollars to expand the CSFP and WIC Program. Those dollars have been there because the programs are good. They are serving a needy constituency and serving it well. But there is one overwhelming truth about federal programs -- the more praise and adulation they receive early in life, the greater the temptation to live on those laurels, to assume that more support and more money will always be forthcoming, and to perhaps assume it is not necessary to run the program efficiently. Praise and adulation are transitory in our business. The honeymoon is rapidly coming to a close and hard-nosed, steely-eyed investigators from GAO and OIG are looking to see if we're anywhere near as good as we think we are.

GAO has begun to look closely at WIC and the USDA Inspector General has raised the problem, which I view as very serious, of retailers charging the maximum amount on the voucher, instead of the regular shelf price, to WIC participants. Our programs are good and they are working but there is still a great unmet need for WIC and CSFP services. The programs will never grow to meet those needs unless the administration of the programs grows better as they grow bigger. That job is up to you.

Public Relations

There is another task you must take on. We live in a time when government and government programs generally are held in minimally high regard. Some of that is deserved -- but much is not. I believe that the increasing lack of faith in use of government action to resolve difficult social problems undermines an important element of our system of government. You are responsible for important government programs that are working well and are reducing serious health problems. Tell people about them. Tell the people in your communities about the good things WIC and CSFP are accomplishing for them. They should know their communities are better, that health costs are reduced, and retardation is diminished because pregnant women and children are eating better. Tell your Congresspeople and your Senators. If they know and understand the value of WIC and CSFP, two important things may happen. First, there is a much better chance that you will get the resources necessary to serve all of the population in need. More importantly, your fellow citizens will know that their tax dollars are being well spent in a good cause; that government can work to solve social problems; and that there is reason to support a system which will not let the poor live hungry and sick in the midst of plenty.



Robert Greenstein - Administrator, Food and Nutrition Service

Budget Process

The title of this part of the agenda is the "politics" of food programs. Part of the politics are within the Department and the Administration itself. Each year in mid-July, the Food and Nutrition Service recommends a budget to the Department for the succeeding fiscal year. During August, all of the top officials of the Department -- the Secretary, the Assistant Secretaries, the Inspector General, and the General Counsel -- get together and they go over all the competing requests from various agencies within the Department, because, were they to fund all the requests from all the agencies -- and this is true in any department -- you'd be billions of dollars over the Department's total target.

Subsequently in September, those recommendations go to the Office of Management and Budget, which in a similar fashion arrays the requests from all the departments against the total federal budget. In January, they go to the Congress, and at that point it's sort of like the iceberg coming above water -- that's where all of you begin to see what happens with the Congressional process, although for us it's really the second part of a year-long process. In Congress, the various appropriations committees go over the budget, and appropriate what becomes the funding for that year.

I won't go into great detail here, but I will say that I have not seen that many markups or debates on Capitol Hill that match the debate and the intensity of the markup within the Department of Agriculture in August, when our budget decisions are made. Congress has basically reflected the funding requested by the Administration for WIC for the past few years, and Carol Foreman's strong role in the USDA meetings has made the difference of tens of millions of dollars for the support of the WIC program.

WIC Audit Findings

Budget debates continue to go on year after year and one of the people I mentioned who is an important player in that debate is the Inspector General of the Department of Agriculture. Shortly after the Inspector General came to the Department, I had a conversation with him in which he described to me some of his audit and investigation plans for the coming year -- this was a couple of years ago. The plans at that time did not include anything on the WIC program. And he mentioned an impression we all shared at that time, that the WIC program really seemed different from many of the other agriculture and food programs. There was little discussion of serious problems in the WIC Program and given that he had to target his audit resources, he was not going to target a great deal towards WIC. That has changed. The fact of the matter is that the WIC Program does have problems.

Retail Problems

One of the most serious problems is the retail side of the WIC program. A major audit was completed by the Inspector General recently on the operation of the WIC program in one State. I sat in on a meeting on that audit where I was shown and personally went through stacks of vouchers. Evidence of fraud on the part of some retailers audited was irrefutable. In the State that was audited, some grocers had been routinely completing vouchers for the maximum value or sending vouchers to the bank without filling in the value. When a blank voucher was received at the bank, the bank redeemed it for the maximum value. Or, vouchers were being altered.

The Inspector General is now studying the retail aspect of the program in a number of other States.

Retailer Monitoring

As we have said over the years, the WIC program works well at the local WIC agency and at the clinics. But that is not the entire program. I think we all have a little bit of a perception problem. Those of you who are in health departments and in nutrition units tend to see your role as getting better health care to people, better nutrition education, and making the programs run better at the local agency level. Most of us have not seen ourselves as investigators in retail stores or as throwing stores out of the program or bringing charges against them. We haven't spent enough effort in doing those things.

We cannot continue to run the program by concentrating just on one side of it and ignoring the other side. There is a need in many States for more visits, more monitoring, more enforcement, and yes, disqualifications of retailers who abuse this program. We're not going to get anywhere if we do not start using penalties -- and it's time to do that.

Results of Program Abuse

Abuse or fraud in any program in and of itself regardless of the consequences, is something that is never excusable. But in this circumstance, the consequences go well beyond that. The funds for the WIC program are limited. Every dollar lost through abuse on the retail side is another dollar that does not go to someone who is on a waiting list or to another local agency that is still waiting to open a program. The very State in which an audit found the problems, in the month of September, restricted benefits to the higher priority participants in the WIC program.

Financial Management

In the area of financial management there are similarly significant problems. Again, many of us in focusing on the health and nutrition aspects, have seen our roles as health administrators, as physicians,

as nutritionists, as dieticians and have not focused on the nitty-gritty of financial management. As a result, in some States there is difficulty in knowing on a timely basis how much money is actually being used in the program.

It now appears that there is at least \$30 or \$35 million dollars that was available and was not spent in the WIC Program in fiscal year 1979. While States across the country cut back the program in September, funds were sitting around unused. Many states that cut back on the program actually had funds that were unused, but because the financial management systems weren't geared up to deal satisfactorily with this, they did not know in time that the funds were there.

Financial management is the other major focus on this new multi-State, across the country, Office of the Inspector General audit and survey. Some very hard questions will be asked and I imagine that they will probably lead to further audits. I also understand that in both the retail area and the financial management area where further audits are forthcoming, that based on the findings in those audits, the Inspector General may be asking FNS to establish over-claims against States to recover funds that have been lost through some sort of negligence or mismanagement. Clearly all of us need to work together to address these problems. And in FNS, we need to do more and we need to give more assistance to you, to address these problems.

Enforcement Actions

In the WIC Program and in our child nutrition programs as well, health departments and education departments have historically not focused on financial management issues. Nor have they been in the situation that social service and welfare departments have traditionally been in, where claims, sanctions and things of this sort are a basic part of operating life and need to be dealt with quickly or else severe consequences result.

For years, in various public assistance programs and in the Food Stamp Program, there have been warnings and eventually sanctions and withholdings of administrative funds where serious problems were involved. In one State the problems were so serious that FNS has been withholding nearly half a million dollars a month in administrative funds from the State food stamp agency. Within 30 days after the withholding was started, massive clean-up began in that State and tremendous progress has been made. In another State, shortly before the funds were about to be withheld, the most massive corrective action program in the history of the Food Stamp Program was issued. In yet another State, \$1.8 million dollars was actually withheld, and again substantial actions were forthcoming. We must do more to enforce our supplemental feeding program requirements.

Congress has indicated where it wants to go in the area of enforcement. Within the past year or 18 months, it has specifically written into both child nutrition and WIC laws, specific authorities and directives for

the Department of Agriculture to withhold administrative funds where serious deficiencies have been identified and sufficient corrective actions have not been taken after warning has been given.

The WIC regulations that came out this summer do contain performance standards that tie into a warning and a sanctions system. I certainly hope it will never be necessary to come to that end. But I do want to be very clear in saying that it is our intention to enforce these performance standards and take them where they lead if that turns out to be necessary.

Funding Issues

First as I mentioned before, when money is lost to the retailers, people and clinics are waiting in line and are not in the program. Secondly, in some financial management systems, States don't know how much money they have, and then the money isn't spent. The majority of the people in the country who are in need of the program are still outside it and are not being fed. We do not want our financial management system to discover 100 days after the end of the year that we restricted participation or cut people off the program and that we have lost funds that went unspent. That is not where we want to take a Program when our intention is to reach more people.

We need to clearly understand as well that the entitlement and automatic funding period for the WIC Program is all over. For years this program had an automatic appropriation through a mechanism known as the Section 32 fund. For fiscal year 1979 and the current fiscal year 1980 there was an automatic entitlement. In previous years the appropriations committees had no say over what the funding level would be for the WIC Program. That's now changed. Starting in 1981, there is no automatic funding. There is no Section 32 money. There is no entitlement. Every single year it will be up to the appropriations committees to determine how much money is to be available in the program. And the appropriations committees, I can tell you, look extremely closely at issues of program management.

Summaries of Other Issues Addressed by Mr. Greenstein

- Reallocations - FNS needs your 1979 fiscal year reports as soon as possible to complete the reallocation process. We are aware that State agencies have had difficulties with the reallocation process and we are considering some restructuring of the process.
- WIC Food Package - FNS needs your comments on the recently proposed regulations. Pay particular attention to the iron requirements for cereals. We have proposed that persons certified for participation due to iron deficiencies continue to be prescribed cereals with at least 45 percent of the RDA for iron. Persons not certified for iron deficiency

may be prescribed cereals providing 25 percent or more of the RDA for iron, with the caveat that the competent professional authority can restrict those persons to the 45 percent cereal if they think there is risk. We have indications that the cereals offered are not always being consumed. So, in the proposal we attempted to make certain that people with iron deficiency get cereal with high iron content, but that others get a broader variety. If the cereal isn't eaten at all it does not do a whole lot of good. However, a cereal manufacturer that will lose a portion of the WIC cereal market is doing a massive and sophisticated lobbying campaign on Capitol Hill, claiming that the reduced iron requirement undermines the entire health purpose of the Department. You should draw your own conclusions and send us your comments.

● Proposed WIC Income Requirements - Our earlier income proposal requiring all States to use 195 percent of the poverty level as the uniform national income requirement met with considerable opposition. In the near future we will publish a proposal of several possible income alternatives. In that proposal we will solicit comments on the original income proposal and on two new alternatives that we believe alleviate problems State and local agencies are having with the new definition of "health services." Some of you have told us that you have serious problems with that definition and that you're afraid some clinics may have to drop out of the program or that some clinics in rural areas where you want to expand may not be able to get into the program. We've got two competing goals here. We really want to reach those underserved rural areas but, we want to have the best health services we can available for the target population. I think we have told all of you that no clinics currently in the WIC Program should be removed under those regulations. Instead, they should be worked with to improve health services. Also, the definition is not as restrictive as some people have interpreted it to be. In a few instances people have believed that they could not satisfy the health services requirements until they checked with FNS and found that they could. When you submit comments on the proposed income regulations let us know which alternative you prefer, why you prefer it and whether or not that proposed income alternative solves any difficulties you have with the definition of health services. If, regardless of the new income alternatives, you still have problems with the definition of health services you should submit comments expressing exactly where and what problems exist. The comments should be very specific.

● Migrant Farmworkers - Serving migrant farmworker families is an area where all levels of administration of the WIC Program have done an inadequate job. Although we've tried several approaches we have still failed to reach enough migrants. I was very disturbed to see that a number of States that received special WIC allocations for migrants did not use a substantial amount of those funds, and did not reach the number of migrants they had hoped to reach when they received the allocations. WIC staff members have too often assumed that general publicity and simply having the funds available would work for migrants

as it does for the main target population. What is needed is stronger outreach networks between local agencies and migrant camps. I hope those of you who were successful last summer will share your experience in our migrant workshop at this meeting. The Field Foundation study earlier this year found tremendous progress in improving the health of low income people over the last ten years through the food assistance programs. However, they did find that one of the few areas where the progress was not so good was with migrant farmworkers. We've got to do a better job there.

● Rural Transportation - The use of administrative funds to transport rural participants into clinics is an issue I'm particularly interested in, especially with the energy crisis. I understand that in recent years, legislation was passed which provides rural transportation grants through the Department of Transportation. It is designed to fund rural transportation systems in which individual programs, such as WIC and CSFP could contribute to the overall amount of money, but where the amount each program contributes is much less, because there are some federal funds and because it is a "shared" transportation system to which many providers contribute. In rural areas, we think that this is something that is certainly worth investigating.

● Outreach - A few weeks ago we published final Food Stamp Program outreach regulations. Those regulations require Food Stamp Programs to refer potential eligibles to WIC and CSFP in areas where there are clinics and caseload space available. In the WIC regulations we require WIC clinics to refer potentially eligible individuals to welfare and Food Stamp Programs. A number of food stamp outreach materials are now being developed and should soon be available to you through the State food stamp office. We think it is particularly important to establish very tight effective referral systems between these two programs. People can't eat just on the WIC foods, people can't pay their rent, or pay their energy bills if they don't have the other basic sources of support they need. These programs have been established by Congress, they are available. We believe people who are in need of program benefits should receive them.

Conclusion

I would like to close by saying that these programs are among the best programs anywhere in the federal government. I think that with all the things one can do in this society, it is a great privilege for all of us to have jobs in which we can spend the working part of our lives making the lives of other people better through our programs. Most of the people needing these programs are still outside them and many people are still suffering serious nutrition and health problems. Given that all of these things are the case, we all must dedicate ourselves to cleaning up these programs as rapidly as possible to make sure that the programs and our own associations with them flourish. Thank you.

QUOTATIONS FROM GENERAL SESSIONS

Mark Hollis, Vice President, Publix Grocery Stores

"In your job, you have a responsibility far greater than just managing programs -- you also have the responsibility of managing people."

"Management is simply defined as getting work done through people."

"Your people will be motivated in direct relationship to the personal motivation that you demonstrate by your leadership patterns. In other words, you deserve the people that you have."

Sarah Short, Nutritionist

"You can spend lots of money for food for your clients ... but, if the people don't eat your food then what good is it? That's why nutrition education is important for all of you, for all of us."

"To make nutrition education exciting, to make it come alive, you've got to have enthusiasm and you have to make it relevant to the people's lives."

"You know your subject. Know your people and start with what they want to know. Throw in what you think that they should know and if the whole thing turns out to be the pits, then start again."

Bill Wood, "Franklin the Good Food Friend"

"Live arts is an exciting format to use - it can certainly get a lot of attention and a lot of interest."

"When I do a show, I do a variety of things. Talking about an attention span, everything I do lasts about 2 or 3 minutes. My thinking is that if children don't like what they are seeing now they're going to see something different in 2 or 3 minutes."

Eugene Crawford, Executive Director, National Indian Lutheran Board

"More programs are needed of this sort; but, not only the bandaid type programs to feed people, I think we have to go deeper than this, and look at the roots, or causes, of hunger, the things that are causing these people not to have an adequate diet."

"There is a common ground where we can all walk together and in many of the areas we do walk together; but, we want to walk closer and we want to walk further together."

Pete Lee, MTO and Associates

"Because groups believe that they are unique by virtue of belonging to a particular group, it is important that you recognize, in delivering services, that you must work with them from the standpoint of that uniqueness."

Thomas McBride, Inspector General, USDA

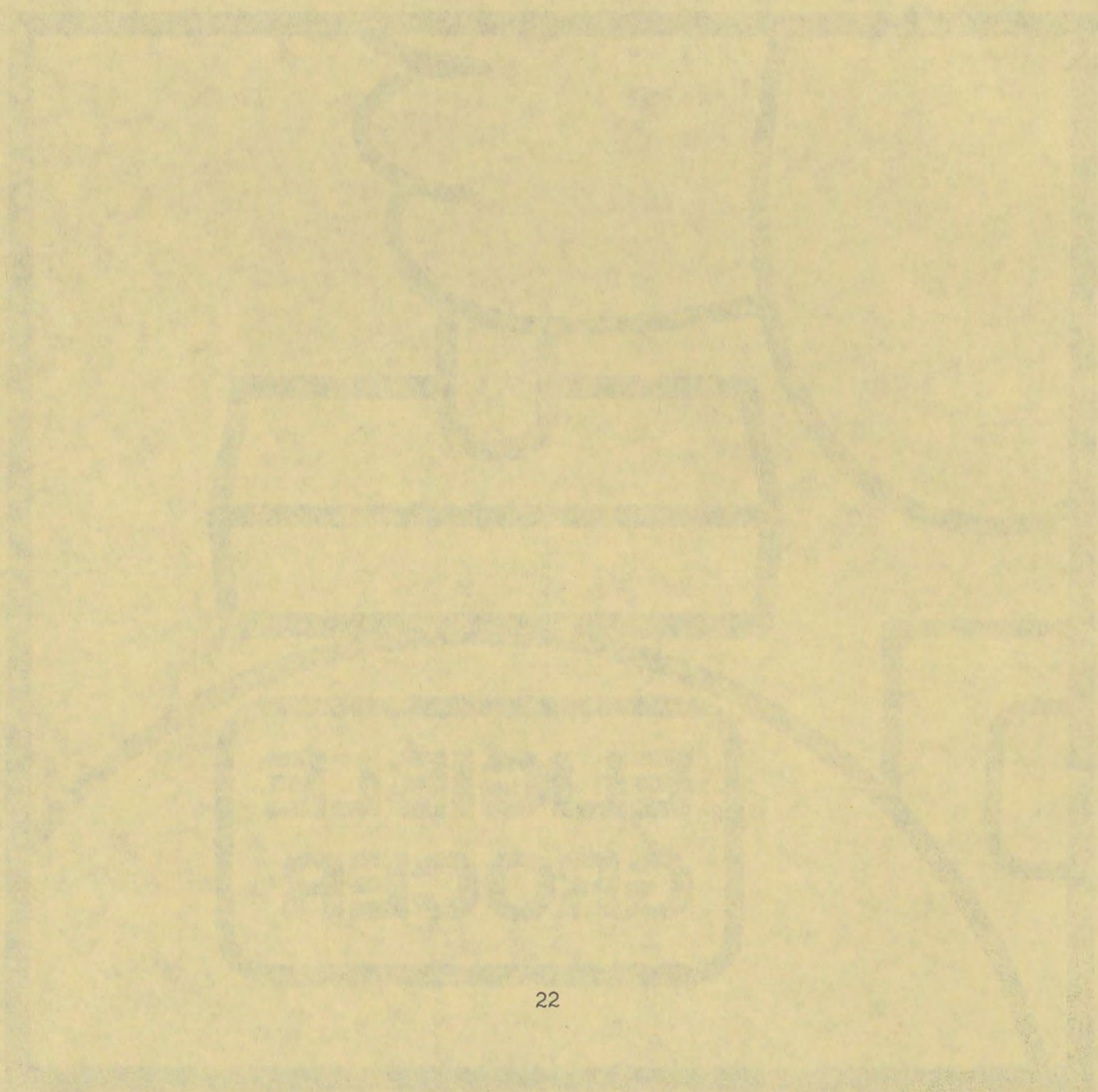
"During the audit process...you should get feedback.... Ours is a system of alliance rather than an adversarial relationship, and nothing makes me happier than to see a final audit report filed in which all corrective action has been taken during the course of the audit."

"For those of you who are administrating WIC at the State and local level, I think it is very important that you fight for the proper priorities.... You are the kind of front line fighters to make sure you get the kind of resources you need to keep the program clean, keep the program popular, and let it grow."

VENDOR MONITORING



VENDOR MONITORING



VENDOR MONITORING

Introduction

On the opening day of the national meeting, FNS Administrator Bob Greenstein strongly emphasized the necessity of WIC Program integrity and accountability. He cited recent audit findings which indicate serious vendor abuse of the WIC Program. He pointed out that when vendors abuse the program to receive payments for which they are not entitled, it is the applicants and local agencies waiting for admittance into the program who are cheated. It is, therefore, imperative that the WIC Program exhibit sound management in order to serve as many participants as possible.

Background

The WIC Program has grown at a rapid pace for the past three years. During the first few years of operation, FNS emphasis was on promoting program expansion and formulating administrative policies. Recently, however, we have seen a move toward tightening guidelines to strengthen program operations. Indicative of this trend is the provision in Public Law 95-627 for establishing performance standards, with violations resulting in monetary sanctions. In response to this legislative mandate, FNS has established WIC Program performance standards and incorporated these standards into WIC Program Regulations. Three performance standards were specifically established to monitor food delivery aspects of the WIC Program. These standards were designed to ensure Statewide vendor reviews by each State agency, prompt transaction of food instruments, and one-to-one reconciliation of food instruments. (Food instruments will be referred to as "vouchers" in the remainder of this chapter). Also indicative of the need to strengthen vendor monitoring procedures are audit findings and the numerous requests FNS has received over the past few months for information regarding prevention of fraud, abuse and waste in the program. These requests have come from Congressional offices as well as from administrative areas of the government and from the General Accounting Office.

Food Delivery Problems

WIC agencies using the retail purchase system give participants food vouchers which may be redeemed at authorized grocery or drug stores for prescribed WIC foods. As of December 1979, almost 90 percent of WIC Program participants were served through the retail purchase system, as opposed to the direct distribution or home delivery systems. Although the retail purchase method has many advantages, it has the disadvantage of being particularly susceptible to vendor fraud and abuse.

Recent audit reports have highlighted the potential for WIC Program mismanagement where the retail system is utilized, and further emphasize the need for stronger monitoring and better control of vendors. Major problems being reported by Office of Audit are:

- Vouchers being redeemed at maximum amount regardless of cost of food purchased.
- Vouchers being altered.
- Vouchers being honored although due dates have expired.
- Lack of or illegible endorsements.
- Omission of purchase price on vouchers, which in some States results in overpayment for vouchers.

Additionally, State Plans and Management Evaluation reviews continue to indicate weaknesses in food delivery systems. FNS collected data in October 1979 regarding food delivery systems in every State. That data indicated these major weaknesses in food delivery systems:

- Inadequate reconciliation.
- Cumbersome food delivery systems.
- Lack of computer edits.
- Inadequate voucher security.
- Inadequate training, guidance and monitoring of vendors.

When designing and implementing a food delivery system, State agencies should consider their ability to monitor the food delivery system chosen. USDA auditors and FNS will evaluate State agencies to ensure that vendor monitoring activities are adequate to reduce and/or prevent abuse. State agencies are fully responsible for monitoring their food delivery systems in order to effectively distribute WIC Program benefits with minimal program abuse. It is understood that cost may be a constraining factor and that, in some cases, funds available for monitoring delivery systems may be limited. However, State agencies should strive to achieve the most effective monitoring system obtainable with funds available for that purpose.

Vendor Monitoring Workshop

The vendor monitoring workshop had the benefit of the experience of two Food Stamp Program employees who are responsible for the vendor compliance operations in that program. The remainder of this chapter will describe the methods used in both the WIC and Food Stamp Programs to reduce vendor abuse. According to the Food Stamp Program experts, vendor abuse is effectively reduced through proper management of the following sequence of events:

- (1) Vendor selection and authorization.
- (2) Vendor education and guidance.
- (3) Monitoring vendor compliance.
- (4) Investigating vendors.
- (5) Imposing sanctions upon vendors.

WIC and Food Stamp experience has shown that when these steps are properly executed most vendors do comply with program requirements. Each step is discussed in greater detail below.

Vendor Authorization

Uniform Eligibility Criteria - Each State agency should establish written standards and procedures for authorizing vendors to accept WIC food instruments. A useful tool is a vendor application form on which pertinent information is supplied. WIC agencies should identify criteria for selecting vendors, such as:

- Location
- Prices of WIC foods
- Availability of WIC foods
- Hours of business
- Reputable business practices

Concern was expressed during the workshops as to whether these criteria, or others which would limit the number of vendors, might be challenged as illegal restraint of trade. The informal opinion expressed by FNS representatives was that use of these criteria would not constitute such restraint of trade. It was noted that a natural tension exists between the need to keep the number of authorized vendors at a manageable level, and the need to provide sufficient WIC vendors to meet the regulatory requirements and to assure WIC participant accessibility to vendors.

Written Agreements - WIC regulations require that the State or local agency enter into a written agreement with participating vendors. Some States require in the agreements that vendors meet conditions in addition to those stated in the regulations. These include requiring the vendor to supply monthly a price list of WIC foods, and requiring vendor attendance at WIC educational sessions. The vendor agreement should be signed by someone who has the legal authority to obligate the store.

Vendor Education and Guidance

The primary goals of vendor education are to promote an understanding of the WIC Program and the importance of the food package, to elicit voluntary compliance with program regulations, and to answer any questions vendors may have. Vendor education should begin with the agency's first contact, and continue throughout the vendor's association with the WIC Program. The purpose of the WIC Program, proper use of food vouchers, and vendor payment procedures should be discussed before the vendor agreement is signed. Written information should also be provided. Onsite training at the time of vendor authorization is very desirable. According to WIC Regulations, education of food vendors is a State agency responsibility; however, the State agency may delegate all or part of the vendor education to the local agencies.

Experience has shown that in most instances the following ideas and techniques should be stressed in educational contacts with WIC food vendors. This is not an exhaustive list and may be supplemented or amended at the State's discretion to correspond to the State agency's particular delivery system.

- Purpose of the WIC Program. The prescriptive nature of WIC foods as necessary to provide adequate diets and improved health to participants should be discussed with vendors. Vendors should be made aware that abuses of the WIC Program may negatively affect the health of WIC participants.

- Stock of WIC Foods. Vendors, regardless of the delivery system used, must ensure that all WIC foods are adequately stocked. This point should be given considerable emphasis, since failure to stock all authorized foods may result in food substitution which defeats the purpose of the program.

- Potential Areas of Abuse. The following categories of abuse have been found to be prevalent and should all be discussed with vendors:

- Food Substitution. Vendors should be reminded that only the foods specifically designated by the State agency may be issued to participants.

- Price Differential. WIC Program participants should never be charged more than the customary selling price for the WIC items.
- Technical Abuses. WIC Regulations, such as cut-off date provisions printed on the vouchers, should be discussed as part of vendor education. Other accountability requirements imposed by the State agency such as maximum dollar values on the vouchers, counter-signature provisions, endorsement of vouchers, and presentation of ID cards should also be the subject of discussion with vendors. Additionally, State agencies should provide educational materials to banks handling WIC vouchers, to minimize abuse and fraud at that stage of WIC transactions.
- Cash in Lieu of Foods. Vendors must never give participants cash in place of the food authorized on the food instrument.
- Onsite Visits. Such visits have proven to be an excellent tool for encouraging compliance with program rules and to promote effective performance. Usually onsite visits constitute interviews with the store manager and/or owner.
- Cashier Training. It is absolutely essential for cashiers to be well educated about program rules. Educational contacts with vendors should always include a discussion of the training provided to cashiers. Some States reported that they had to take copies of problem vouchers to the store manager to demonstrate the need for cashier training. With the cooperation of managing vendors, the State agency may wish to undertake direct group training sessions for cashiers. An approach that has been effective for the Food Stamp Program has been the inclusion of one or more lessons as part of the cashier training program of chain stores and community colleges. Cashier turnover has been cited as a problem in many States and demonstrates the need for ongoing training and education.
- Educational Visits to Grocery Association Meetings. State level WIC Program officials may find that grocer association meetings present opportunities to "pass the word" about the WIC Program. This heightens the visibility of the State's WIC Program and provides positive public relations. On a practical level, such opportunities should leave grocers better informed about the WIC Program so that they may return to their stores more qualified to instruct their employees.

● Visits With District Managers of Chain Stores. Since district managers are responsible for the overall operating efficiency of a group of stores, their support is very helpful in ensuring high standards of vendor performance. Furthermore, if problems occur at a specific store, the district manager may be able to help in solving problems. Moreover, contacts with the district managers may reduce the number of onsite visits necessary to the stores under their jurisdictions.

● Civil Rights. Vendors must extend courteous and respectful treatment to WIC participants. Vendors should be made aware and reminded that they may not discriminate against program participants because of race, color, or national origin.

● Mailings. Written educational information and advice, as well as new policies, should be mailed to participating vendors from time to time as the need arises. This can be a very effective tool to communicate the ongoing needs and policy changes of Statewide programs. Mailings can include program information materials sent to individual vendors, chain store groups, retail clerk unions, trade associations, dairy delivery companies and others as appropriate, for distribution within their organizations. To ensure that materials are read, only important information should be sent by mail (the outside of the envelope could be marked "IMPORTANT WIC INFORMATION"). Mailings should not be so frequent that they are ignored. When mailing educational material, it is a good idea to ask for return information. This helps to ensure that it is read and also serves as a check that the store is still in business.

Monitoring Vendor Compliance

There are three principal activities for monitoring vendor compliance:

- (1) Analyzing voucher redemptions.
- (2) Making onsite visits to vendors.
- (3) Handling complaints.

● Analyzing Voucher Redemptions. The reconciliation of vouchers serves an important monitoring function. In addition, routine reviews of redeemed vouchers should be performed to look for irregularities or questionable practices.

Most of the States with computerized food delivery systems use edit checks for monitoring. Edit checks can be used to maintain control over lost, stolen, or counterfeit vouchers. Also, obtaining monthly printouts indicating stores redeeming vouchers at maximum value, or outside a specified average range, is of assistance in identifying program abuse. A variety of cost parameters are used by State agencies to establish edit limits. Such systems need continual updating to ensure the timeliness of the data used. Follow-up based on the edit checks is extremely important. In some States,

it is done on an individual voucher basis, while in others it is based on store trends. The following two store trends were among those cited as indications of the need for further inspection of the vendor's practices: (1) voucher redemption figures that consistently end in .00 or .50; and, (2) voucher redemption prices that are often the same, although the prescribed items are different.

Some States contract with a central bank to screen redeemed vouchers for such things as price, alteration, vendor identification, and expiration dates. The cost for such services varies from State to State, but is usually at least five cents per voucher.

● Onsite Visits. Onsite visits to vendors should include checking shelf prices, observing the variety and quantity of WIC food items available, observing check-out practices, reviewing WIC Program purposes and requirements with the manager, and offering to answer questions about the program. If any program violations are observed, they should be brought to the attention of the manager.

Onsite reviews may be triggered by information received from participants. The idea of training and involving participants in the vendor monitoring process received strong support in each workshop. Participants can be helpful in observing whether the cashier checks countersignatures, whether anyone ensures that only the authorized items are purchased, whether the price charged for the items is accurate, and so on.

Food Stamp Program field staff who are performing vendor compliance reviews for that program are another important resource to be contacted. Those field staff employees are often knowledgeable about local vendors and their business practices. Establishing relationships with food stamp field staff may be very beneficial to monitoring efforts. Although the monitoring of the WIC Program vendors is a State agency responsibility and the monitoring of Food Stamp Program vendors is a Federal responsibility, the individuals performing the monitoring can exchange information and improve the job done by both groups. Furthermore, the Food Stamp Program field staff have developed innovative and effective methods of monitoring vendors and can provide direction to State agencies.

● Complaints. When a WIC agency receives a complaint about a vendor, a clear description of the problem should be obtained from the complainant. The agency should then bring this to the attention of the store manager. Depending upon the nature of the complaint, redress should be sought from the vendor, and any

incorrect practices should be changed immediately. An onsite visit may be necessary and should include observation of all aspects of the vendor's performance, and a discussion with the manager.

Warnings and Investigations

Investigating vendors suspected of Program abuse goes a step beyond monitoring. As stated previously, most vendors will comply with Program requirements when they are made clear. However, when a vendor appears to be out of compliance, the problems should be clearly pointed out to the vendor. If the problems are not corrected, a clear warning should be made that failure to comply with the terms of the vendor agreement can result in the withdrawal of authority to accept WIC food vouchers. If an oral warning does not result in elimination of the problems, a written warning should be sent by certified mail. In these warnings reference should be made to the vendor agreement and its provisions regarding the vendor's responsibility to comply with Program requirements.

Many WIC vendors also accept food stamps, which usually represent a great deal more monetary value to the vendor. A vendor who appears to be failing to comply with WIC rules should be made aware that disqualification from participating in WIC can also result in further investigation and possibly the loss of the authority to accept food stamps.

If, after onsite visits and formal warnings, there is reason to believe that the vendor is still out of compliance, steps should be taken to investigate and, if necessary, to remove the vendor from participation in the WIC Program. The Food Stamp Program investigation techniques can be used to investigate many types of abuse such as the sale of non-WIC foods, giving participants cash in lieu of WIC foods, and charging participants more than the customary price for WIC foods. Food Stamp Program vendor investigations usually involve an attempt to purchase unallowable items by a person posing as a participant, since this is a frequent and easily detected form of Program abuse. This approach can be used to observe WIC Program abuse as well.

State or local organizations and agencies with investigative expertise may be willing to assist in the investigation of WIC vendors. State agencies should enlist the assistance of community or State groups which have such expertise, for example, Welfare fraud associations and investigators, police investigative units, State agencies which regulate the sale of liquor, and State prosecutors.

Throughout this workshop, it was emphasized that prevention, through authorization, training, and monitoring, is the most important aspect to concentrate on and that investigations and sanctions should be resorted to only if absolutely necessary.

Imposing Sanctions Upon Vendors

When it is established that a vendor is out of compliance with WIC Program rules, several courses of action are available to WIC agencies. Section 246.10(d)(7)(i) of the WIC regulations provides for up to a one year suspension of vendors who abuse the Program. In addition, in the case of deliberate fraud, vendors can be subject to the penalties outlined in Section 246.18 of the regulations.

State agencies should develop specific warning and sanction procedures to serve as guidelines in individual cases. Workshop attendees recommended that such standards not be so rigid as to eliminate human judgment in determining vendor intent.

The costs involved in pursuing claims against vendors were discussed at several workshop sessions. Some States have been successful in recouping vendor overcharges, but many States have experienced difficulties. It was agreed by most workshop attendees that a point of diminishing returns can be reached, when it becomes more expensive to pursue a claim than the amount being sought.

In some cases, legal action against a vendor can be based upon State laws. Rather than rely upon generally applicable laws for dealing with problem food stamp vendors, many States have passed laws specifically designed to deal with food stamp abuses. It was suggested that WIC State agencies consider requesting similar State laws.

Some States have had problems persuading prosecutors to take cases against WIC vendors. However, prosecutors might be more willing to accept such cases if they were involved in the early stages of the investigation process. Some workshop attendees believed that prosecutors would be willing to accept cases against WIC vendors because of the political value of opposing white-collar crime and the loss of taxpayers' money.

Action should first be sought through the administrative procedure of vendor disqualification rather than through legal prosecution because of the cost and difficulties of court action. Regardless of the course of action taken, retailer disqualifications should be advertised in local media and in retailer association journals. Such negative publicity serves as a deterrent to future vendor abuse.

Workshop Recommendations

Many workshop attendees were enthusiastic about increasing their efforts to curtail vendor abuse. The workshops provided an opportunity for State agencies to exchange different ideas on methods currently used to monitor vendors. The following recommendations emerged from the workshops.

● FNS Assistance and Guidance. FNS should provide guidance concerning the proper means and legal ramifications of conducting investigations. Food Stamp Program employees and field staff experienced in vendor compliance operations should train FNS Regional Office staff and/or State agency staff about investigative techniques. Some workshop attendees also recommended FNS participation in the vendor monitoring activities. In addition, State agencies should seek assistance from existing investigative units within the State government.

● Participant Involvement. WIC participants should be encouraged to assist in monitoring vendors, because they are in the optimum position to observe vendors' business practices and to hear of abuse. Participants are a valuable asset in the monitoring process and should be trained to assist State agencies.

● Food Stamp Store Authorizations. FNS should provide the State agencies with the Federal requirements retailers (grocers) must satisfy prior to receiving authorization to accept food stamps.

● Clear Food Voucher Design. Food vouchers should be carefully designed to avoid complications and confusion for the vendors and participants. The layout and print size used on the voucher can result in erroneous charges. For instance, if the maximum value of the instrument is printed in very large type, and the words "actual amount of sale" are in very small type, there may be a greater likelihood that the instrument will be erroneously redeemed for its maximum value.

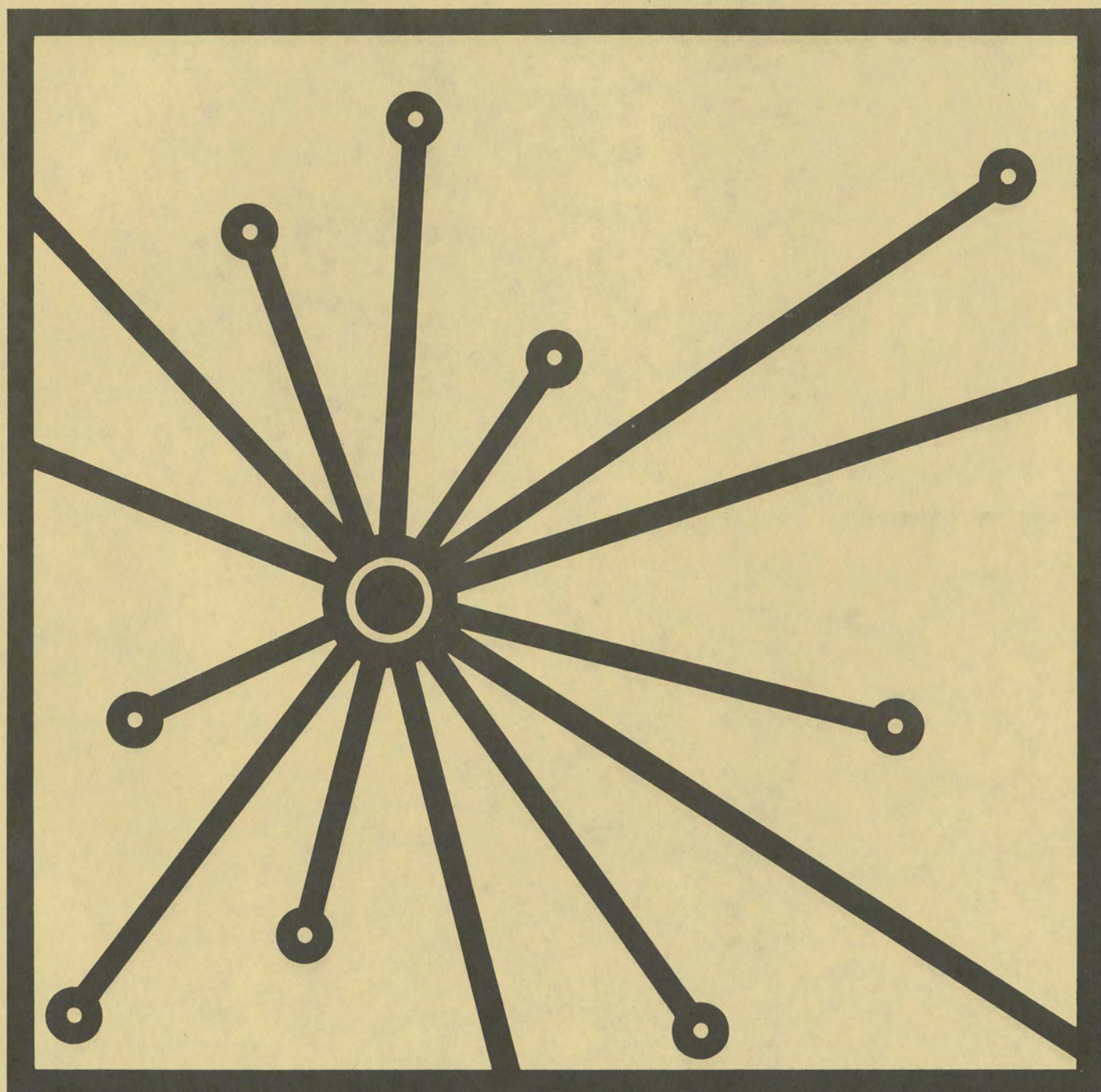
● Claims. FNS should establish a minimum dollar amount below which State agencies could disregard making claims against vendors. This recommendation was made because the administrative costs involved in pursuing a small claim can exceed the amount of the claim.

● Hotlines. State or Federal hotlines should be established for reporting vendor abuse.

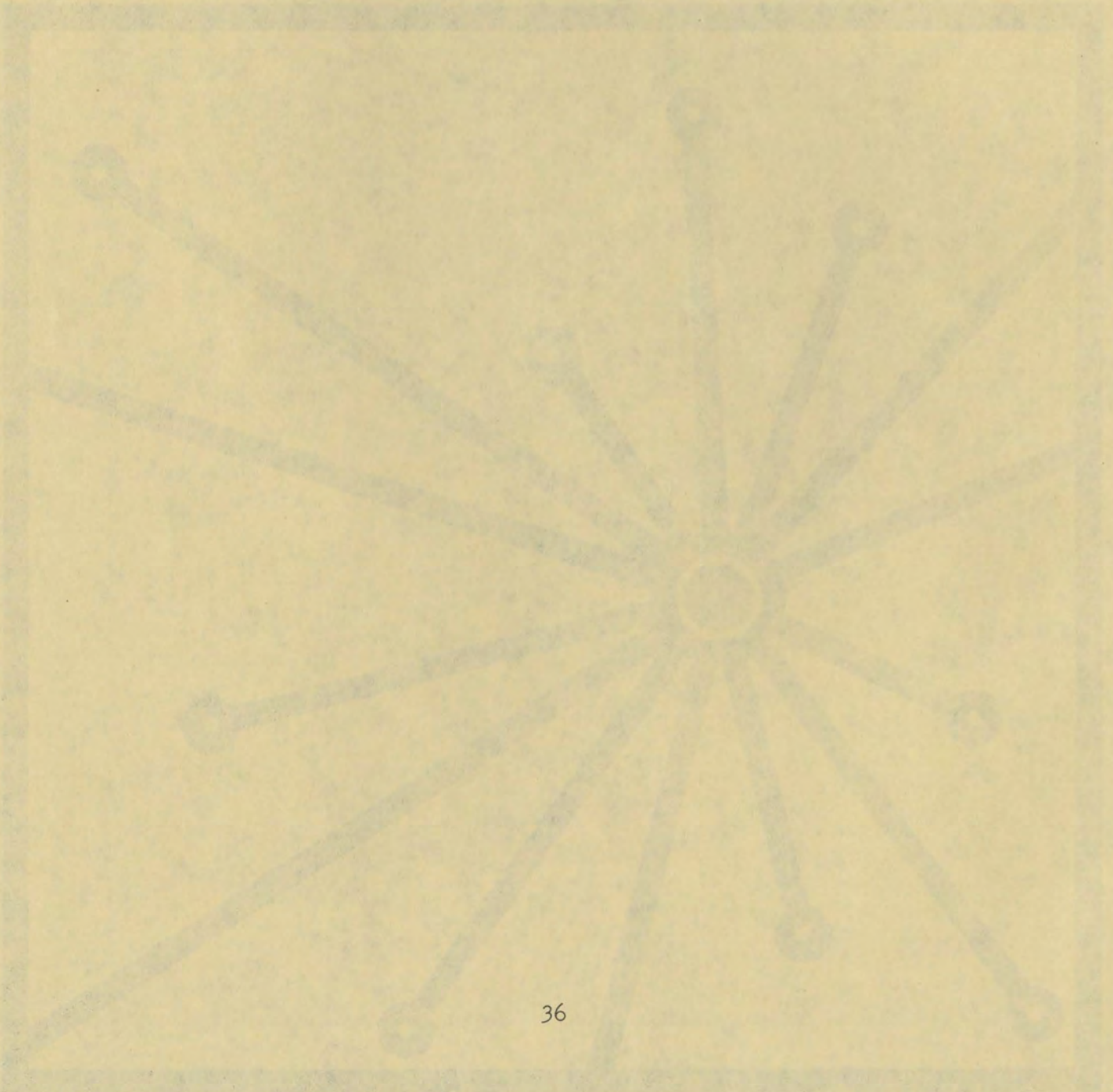
FNS Actions

- Participant Assistance with Vendor Monitoring. A task force is currently developing methods for encouraging participant involvement in the WIC vendor monitoring process.
- Data Base on Food Delivery Systems. The available information on data such as retail systems, store authorization procedures and ADP systems for monitoring is being compiled into a format which lends itself to an evaluation of strengths and weaknesses in monitoring procedures.
- Training on Vendor Monitoring. An evaluation is underway to determine ways in which the Food Stamp Program compliance staff, which monitors vendors, can train WIC Program staff or possibly assist State WIC staff with vendor visits.
- Vendor Education Materials. Vendor education materials and ideas will be compiled from State Plans and other pertinent sources. Assistance will be sought out from major retailing chains, cashiers' unions and small retailers to determine the materials which should be used or developed for effective vendor training. The material will stress correct voucher redemption, but will also address appropriate behavior toward WIC customers. The training materials may include a short film or slide show, a manual and brochures.
- Vendor Authorization. FNS will study vendor authorizations to establish guidance and criteria for store selection. They will also determine: (1) If it is feasible or necessary to limit the number of authorized vendors; and (2) If it is feasible to use vendor-specific vouchers (redeemable only at one designated store) to improve accountability or, if such vouchers would impose too many difficulties upon participants.
- Monitoring Systems. Efforts will be made to define the tolerances in price and error rates on vouchers that States should strive to achieve in their monitoring systems. Voucher systems will also be evaluated to determine the systems and types of vouchers that provide the best means to control voucher redemption.
- Federal Hotline. State agencies which do not have a telephone number available for reports of vendor abuse may direct callers to the toll free hotline number for the USDA Office of the Inspector General: 800-424-9121. Suspected abuse of any USDA program can be reported through that telephone number. Callers within the Washington, D.C. metropolitan area should use the local number for the Office of the Inspector General: 474-1388.

LOCAL AGENCY FUNDING



LOCAL AGENCY FUNDING



LOCAL AGENCY ADMINISTRATIVE FUNDING

The local agency is the delivery site for both the benefits and services to the participant. Consequently, USDA is very concerned about the local agencies' abilities to meet the needs of the service area and to improve the delivery of benefits and services. In both the WIC and CSF Programs, specific regulatory requirements have been established regarding the distribution of administrative funds to the local agencies. This chapter discusses those regulatory requirements and the different methods State agencies use to distribute administrative funds to local agencies as discussed in the National Meeting Workshop.

WIC PROGRAM

Background - Requirements of Public Law 95-627 and WIC Regulations

As a result of P.L. 95-627, State agencies are required to distribute WIC administrative funds to local agencies under allocation standards developed by the State agency in cooperation with several local agencies. Distribution of Funds, Section 246.14 of the WIC Regulations, includes provisions to incorporate this requirement. In addition, the law and the regulations require that such allocation standards take into account factors which identify the varying needs of the local agencies.

Public Law 95-627 requires that State agencies develop a funding procedure which furthers proper, efficient and effective administration of the Program. State agencies must develop a funding procedure with the cooperation of several local agencies which are a representative sample and which take into account the varying needs of different types of local agencies. This sample shall include a rural agency, an urban agency, a small agency, a large agency and, where applicable, a migrant or Indian agency. The procedure must use factors such as: the type and ratio of staff needed to serve the estimated number of participants; the number of participants served by the local agencies; the variation of salaries of personnel; the types of equipment needed to be purchased for certification; the expenses the local agency may incur for providing bilingual services and material where the participant population contains a significant proportion of non-English speaking persons; the cost of special services needed to reach particular members of populations such as migrants and Indians; costs related to rural and urban areas; and financial and in-kind resources other than Program funds which are available to the local agency.

Need and Intent of Additional WIC Requirements - In the past, many State and local agencies negotiated budgets mainly on the basic line item costs such as salaries, supplies, etc. Sometimes, local agencies were not able to comment on the budget authorized or on their operations. The local agency was just informed of the funds they were to use to operate the Program. In other States, locals were not provided with advance funds. Expenditures were reimbursed as the costs were reported. As a result,

there was a lack of communication between the State and local agencies. This lack of communication could also be found in areas other than funding and caused many problems in the operation of the WIC Program.

Still, other State agencies employed the same method USDA used to allocate funding, which was to allocate funds as a percent level of the monies expended for food. As with the Department's method, when State agencies allocated funds to local agencies on a straight percentage of the food expenditures, the varying differences among local agencies were not necessarily taken into consideration. The intent of both the law and the regulations was to encourage State agencies, with input from local agencies, to reevaluate their funding procedures to local agencies and ensure that available administrative funds are distributed in the most effective manner.

WIC Funding Procedures Presently in Use

The WIC Regulations issued July 27, 1979, required State agencies to implement the requirement to develop a funding procedure for the allocation of fiscal year 1980 administrative funds to local agencies, and to obtain input from the local agencies in this process. From a review of the funding procedures submitted in the 1980 State Plans of Operation and Administration, and from discussion in the National Meeting Workshop on Local Agency Administrative Funding, it was learned that approximately one-half of the State agencies used a negotiated budget, one-fourth used some kind of formula, and the remaining fourth based funding mainly on a percentage of the food grant or on caseload. The following is a discussion of those three methods State agencies use to determine local agency funding and the issues that are of greatest concern in each process.

● Negotiated Budgets

About half of the State agencies continue to use a negotiated budget system for all or part of the local agency administrative funds. Some States are using a straight line item budget which includes items such as: salaries; fringe benefits; travel; equipment; supplies; automated data processing; printing; telecommunication; indirect costs; rent; and professional fees (audit). Several have developed other items of consideration in determining the funds a local agency would be allocated. Some additional items used are employment data, cost-of-living differences, population density and the increased cost of serving certain clientele. Monetary values are assigned to each item and the additional funds are added to the proposed budget.

The negotiation process can be conducted in several different ways. One method used is for the local agency to submit a budget to the State agency. The State will then review the budget and either approve it as submitted or discuss any changes with the local agency. The reverse can also be employed. The State agency notifies the local agency of what the State proposes as a budget for the local agency and the local will either accept the proposed funding or make comment on it for further negotiations.

Many State agencies find that negotiated budgets are the most flexible and effective means of ensuring that each local agency's administrative funding needs are met and in providing local agencies the opportunity to participate in decisions. Other State agencies have encountered problems in meeting the budgetary levels requested by local agencies, verifying that costs listed are reasonable, ensuring that local agencies allow sufficiently for future expenses and ensuring that small local agencies obtain a fair share of funds.

To ensure the reasonableness of local agency budget requests, some State agencies perform analyses of historical expenditures in various cost categories. Other State agencies develop staffing standard guidelines to use as a benchmark for staffing expenses (below is an example of one standard).

<u>Number of Participants</u> <u>Monthly</u>	<u>Full Time Nutrition</u> <u>Personnel</u>	<u>Other Full Time</u> <u>WIC Personnel</u>
Under 50	-	-
51 - 150	.25	.25
151 - 300	.5	.5
301 - 400	.5	1.0
401 - 500	.5	1.25
501 - 600	1.0	1.5
601 - 800	1.0	2.0
801 - 1,000	1.5	2.5
1,001 - 1,250	1.75	3.0
1,251 - 1,600	1.75	3.5
1,601 -	1.75	3.75

Where State agencies encounter problems with local agencies expressing concern that some other local agency is receiving a funding advantage, some State agencies conduct budgetary meetings. At such a meeting each local agency would present its budgetary request, justify the need for the various cost categories and the group would reach a decision on each budget. Generally, the local agency response is favorable to this approach as it provides an opportunity to share in the decision making process and learn the funding circumstances of other local agencies. It is also helpful from the State agency's perspective in that the State is relieved of making subjective decisions on each budget independently without the benefit of other local agencies' input and expertise. This system has also been found helpful in discussing the respective share of funds and responsibilities to be assumed by the State agency and local agencies.

● Percentage Funding

Many States still use a percentage method for all or part of the local agency funding allocation. Most common is a funding method which allocates funds on the basis of a percentage of the food grant or based on caseload size. However, due to economics of scale and unique local

agency circumstances, most State agencies have introduced other elements into this process. One system which uses a percent of the food grant also brings into consideration the difference in urban and rural, and large and small local agencies, by varying the percentage as the size of caseload varies. For instance, if the caseload was 0-499, the local would be allocated 20 percent of the funds allotted for food for administrative costs. If the caseload was 500-999, the local would be allocated 17 percent. In this way, the higher costs of the smaller or more rural local agency are taken into consideration.

Overall, it was found that this method is employed by State agencies that believe the number of participants served is the single most important factor in funding local agencies. However, it appeared that State agencies are less inclined to use this method as the sole factor in distributing funds due to other considerations not related to caseload size.

● Formulas

Some State agencies select a formula for use in distributing allocations. Many variations are used in the provisions and application of such formulas. The formulas used pinpoint factors such as caseload, salary levels and rurality as the most important measures of need among local agencies. Some State agencies incorporate provisions such as those used in the national administrative funding formula, including a minimum grant and/or base grant, maximum grant, percentage guarantee, and remaining funds distribution.

The formula is often a basis for allocating the largest portion of the administrative funds and the remaining funds are distributed on a negotiated basis. In some cases, a negotiated budget process is used with a remaining funds portion distributed based on a formula.

In some State agencies, the formula is used as a starting point in the budget preparation process. The State agency advises each local agency of the funds allocated by the formula, then requests submission of a line item budget. Some local agencies can justify an amount exceeding the formula and others justify an amount of less than the formula. Consequently, the end result is local agency budget requests that eventually balance out within the State's administrative funds allowance.

A variation of this method is to use the formula as a base fund and request a local agency budget which identifies activities or expenses which cannot be funded within the formula-allocated level, but with the requirement that all these activities or expenses be listed in order of priority with the understanding that if the administrative funds cannot cover all requests, only the highest priorities will be funded.

WIC Reallocation

In the course of discussion in the workshops, it was established that as with administrative funding, reallocation is a multi-faceted issue and has been dealt with differently among State agencies.

WIC Program regulations have established a policy of reallocation of unspent funds in an effort to maximize Program growth and minimize unspent funds. While this system has resulted in accelerated growth, it has caused administrative problems (particularly with July allocations) for State agencies which must amend contracts with local agencies. One State agency dealt with this problem by designing a contract that permits the State agency to increase or reduce the budgetary level in a contract upon 30 days notice to the local agency. Understandably, State agencies vary in the latitude permitted under State law and the fiscal policy of each State, but generally, the greater the flexibility in adjusting contracts, the easier it is to deal with the reallocation process.

Aside from National reallocations, there are also many State agencies that have a Statewide reallocation policy of some type to better ensure utilization of funds. Other State agencies use an incentive system to encourage growth. One incentive method is to incorporate in the funding method a local agency's past performance in increasing participation. The incentive factor is based on the percentage of the eligible population served by the local agency compared to the percentage of the eligible population served which was set as a goal at the beginning of the fiscal year.

COMMODITY SUPPLEMENTAL FOOD PROGRAM

Background of CSFP Regulatory Requirements

Until the passage of P.L. 95-113 in September, 1977, and the subsequent issuance of the CSFP Regulations, the Program's appropriated funds had only been used for purchasing the commodities while the cost of administering the Program had been covered by State or local funds, or other third party sources such as the Community Services Administration grants. Since State involvement in the administration and funding of CSFP had been minimal in most cases, local sponsors of CSFP had been most vocal in demanding Federal assistance for administrative costs. The concerns of the local agencies were particularly evident in the major metropolitan areas served by CSFP. These local communities were suffering from a tight funding situation in urban areas throughout the nation.

The Senate Select Committee on Nutrition and Human Needs had, over the years, received very positive testimony with regard to the Program, and as a result, wanted to preserve and improve it. The Committee, therefore, submitted a questionnaire to Program Administrators soliciting recommendations about the Program. Their response reaffirmed that the Program

had a very significant impact on the communities it served, but that administrative funds were badly needed. Therefore, in September of 1977, P.L. 95-113 extended the authorization of the Program through fiscal year 1981 and authorized USDA to provide each "State or local" agency administering CSFP a certain share of administrative funds. The final 15 percent level of funding administrative costs represented a compromise position agreed upon by the Conference Committee on the bill which became P.L. 95-113.

As stated above, since State involvement in the administration of the Program was minimal in some cases, and local agencies were the ones actively seeking the administrative funds, splitting the funds between the State and local agencies would assure some funding for both parties. Since both had some responsibilities, the approach provided USDA with leverage for compliance and corrective action at all levels.

After much deliberation, the Department decided upon the formula described in the regulations published in March of 1978. Additionally, to further ensure that the funds remaining after the State agency had received its share were divided equitably among the locals, the regulations required that those funds be allocated based on the need of the local agency.

After publication of the 1978 regulations, the Department received a number of comments regarding the section on administrative funding. Many of the comments requested changes in the method used by FNS for computing State agency funding levels. The commenters also stated that the burden of the cost of transportation of food within the State should be borne by the local agencies rather than by the State agencies, or that more monies should be given to the State agencies. Commenters believed that State agencies were not able to retain sufficient administrative funds to properly administer the Program. The Department agreed that some changes were needed and as described below, revised the section on administrative funding in the regulations published in March of 1980.

Former State Agency Administrative Funding Formula

In fiscal years 1978, 1979 and the first half of 1980 the amount of administrative funds provided to each State agency was determined by FNS each quarter based on 15 percent of the estimated value of the total commodities ordered by all State agencies for the quarter. After the total amount of the available administrative funds for the quarter was established, FNS determined each State's share as follows. Based on the most current month's, participation reports, the number of participants in each State was divided by the total number of participants nationally. This produced each State's percentage of national participation and, that percentage was then multiplied by the total amount of administrative funds available for the quarter to arrive at the State's quarterly administrative allocation.

Complaints about that formula were that: States could not properly plan or budget for each year because they did not know at the beginning of the year what their total annual administrative grant would amount to; quarterly computation of the administrative grants based on estimated

food orders resulted in great fluctuation in the grants from quarter to quarter; some States received less than 15 percent and others more than 15 percent of the commodities ordered in their State; and, the formula did not result in allocation of all available funds. Therefore, the formula was revised to ensure a more stable and equitable allocation.

Current State Agency Administrative Funding Formula

Effective April 1, 1980, the amount of administrative funds provided to each State is determined annually, based on 15 percent of the total funds appropriated for commodities for the CSFP for the fiscal year. As with the former formula, each State's share is based on its percentage of the national participation figures. However, participation figures are no longer based on the most current month's participation reports. Instead, the number of participants both nationally and in each State are based on the average participation over a one year period.

At the beginning of each fiscal year, States will be advised of the projected amount of their administrative funds for the year. However, the grants will continue to be allocated on a quarterly basis and if the State agency is not meeting projected expenditures, such as when the number of participants served by a State agency decreases, there is the possibility of up to 25 percent of the funds being recovered and redistributed to new State agencies or to State agencies with increasing caseloads.

State Agency Share of Administrative Funds

The State agency must distribute the majority of the administrative funds to its local agencies. The past and current CSFP Regulations provide a limit to the amount of funds a State agency may retain at the State level as determined by the following formula:

State Share -- 15 percent of the first \$50,000
 plus 10 percent of the next \$100,000
 plus 5 percent of the next \$100,000

Based on that formula, the previous regulations restricted the State agency to a maximum of \$22,500 per year in administrative funds. However, the current regulations provide two new revisions in the distribution of funds between State and local agencies. These revisions address State agency warehousing costs and the costs of transporting commodities to local agencies. Each of these changes from the 1978 regulations was made in response to complaints that some State agencies were unable to administer the CSFP with the amount of funds they were allowed to retain rather than pass on to the local agencies.

Warehousing. As previously done, storage and handling costs at local warehouses will continue to be paid for by local agencies. However, now State agencies with their own warehousing facilities are permitted to keep additional administrative funds to cover some of the expenses of those warehouses. With FNS' approval, the State agency may now retain funds in excess of the \$22,500 annual limit to cover warehousing expenses.

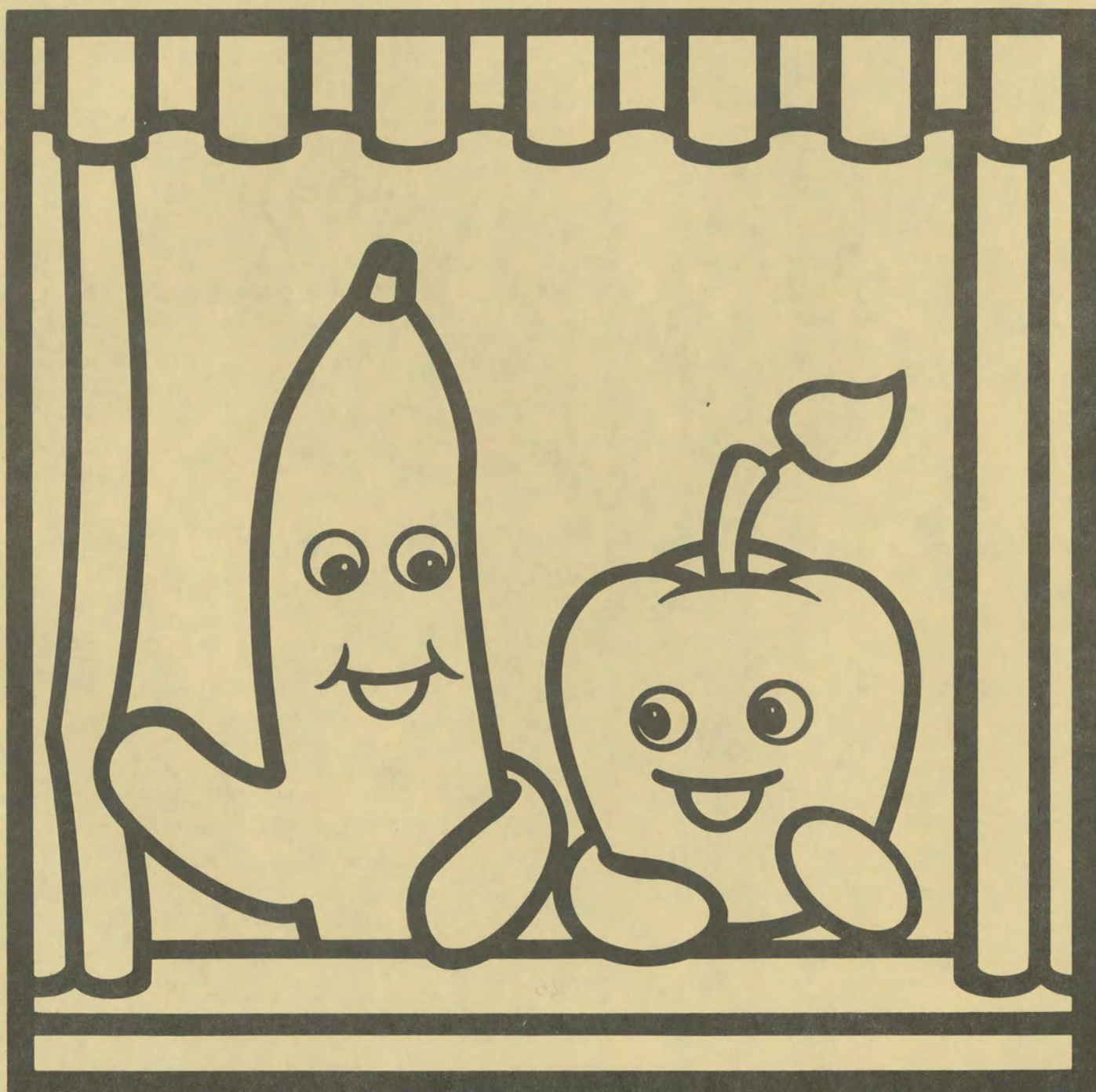
Transporting Commodities. The previous regulations prohibited State agencies from charging local agencies for any portion of the expense of transporting commodities to local agencies. The State agency had to bear such costs along with its other administrative costs. In some States, that resulted in insufficient funds for other necessary administrative expenses. Consequently, the current regulations allow State agencies to charge local agencies for transporting commodities within the State.

Local Agency Share of Administrative Funds

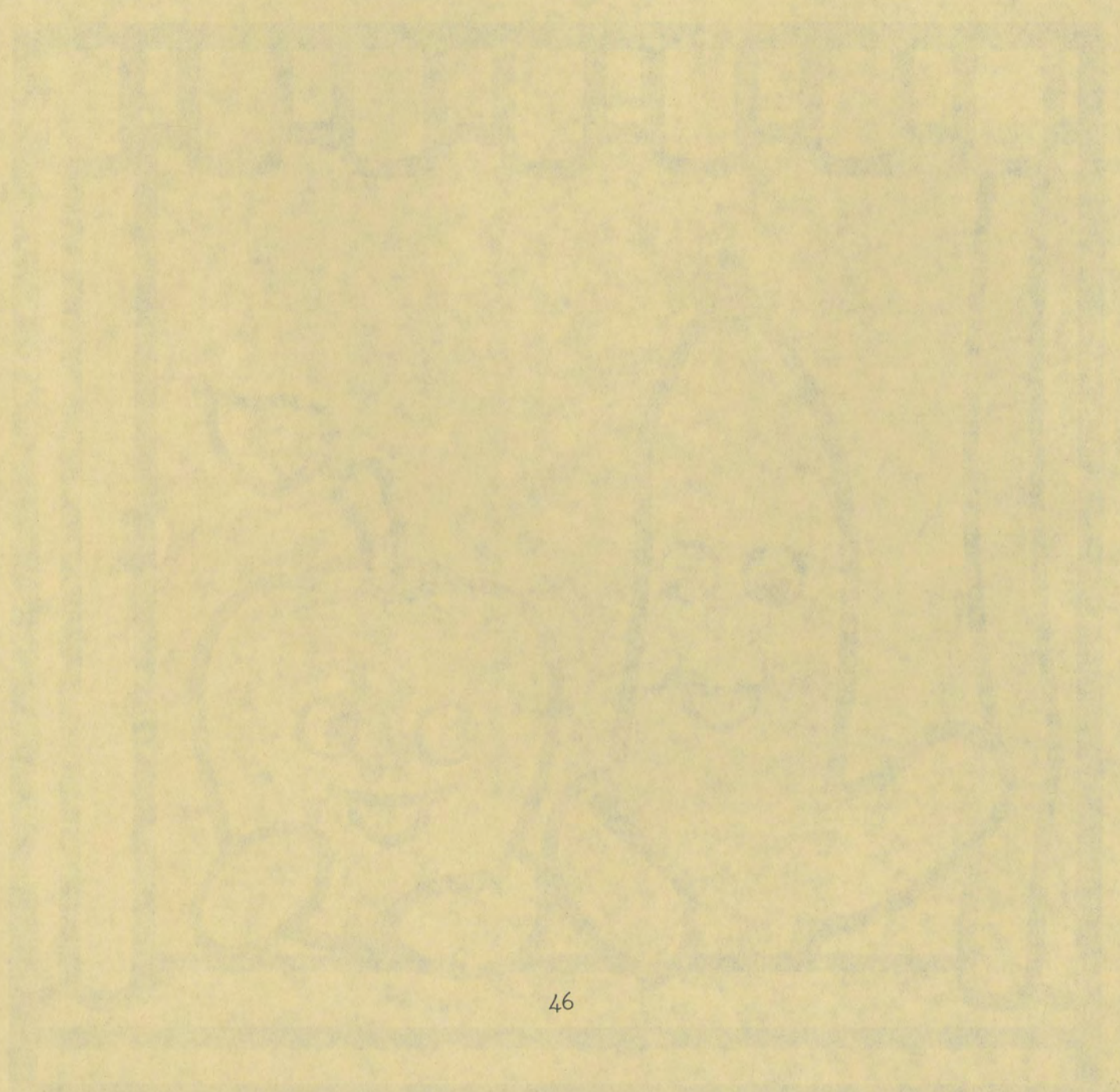
All remaining funds from the total allocation to the State and any unused funds at the State level must be distributed to the local agencies. The State agency disbursing the administrative funds to local agencies must ensure that the local agencies evidencing higher administrative costs, while demonstrating prudent management and fiscal controls, receive a greater portion of the administrative funds. In essence, the CSFP State agencies should be looking at some of the same factors as WIC State agencies in allocating administrative funds to their local agencies. These factors include warehousing costs, caseload, rurality, staff needed, and variation in salaries.

At the present time, many of the CSFP State agencies distribute administrative monies to the local agencies by negotiating budgets. Usually, this includes using line items such as salary, rent, etc. Since the State agencies who operate CSFP have funding requirements similar to those of WIC State agencies, the discussion of different funding methodologies addressed in the WIC Program portion of this chapter are also applicable to CSFP.

NUTRITION EDUCATION



UNIVERSITY
NOTES



NUTRITION EDUCATION

The requirement that nutrition education be provided to CSFP and WIC participants, is strongly supported at Federal, State and local levels of program administration. There is a growing recognition that nutrition education is an essential part of CSFP and WIC Program services. The provision of food may encourage women to seek health care services earlier in their pregnancy, however, continued long term improvement in participants' health and nutritional status is achieved through nutrition education which encourages and teaches participants to develop and maintain optimal nutritional status. In addition, nutrition education improves the nutritional well-being of other family members who cannot qualify for the direct benefits of supplemental foods and health services.

Legislative Background

Nutrition education has always been an integral component of the WIC Program although not mandated in legislation prior to 1978. Regulations issued to implement Public Law 92-433 (1972) identified nutrition education as an example of an activity that States could conduct as an adjunct to the WIC Program. Federal funds were specifically authorized for nutrition education with the passage of Public Law 94-105 (1975). This law required States to submit a description of plans on how they would spend administrative funds, including the manner in which nutrition education services would be provided. The 95th Congress further strengthened nutrition education in the WIC Program by requiring in Public Law 95-627 (1978), that annual nutrition education expenditures are at least equal to one-sixth of the State agency's total administrative expenditures.

The legislative mandate for CSFP, Public Law 95-113 (1977), depicts the cost of nutrition education as a component of overall program administrative costs.

Regulatory Goals

One of the major thrusts of the current CSFP and WIC regulations is an increased emphasis on the importance of nutrition education in the two Programs. In both programs, the goals of nutrition education are to emphasize the relationship between proper nutrition and good health, and to help participants achieve a positive change in food habits by utilizing supplemental and other nutritious foods. This is to be done in the context of the ethnic, cultural, and geographic preferences of the participants with consideration for educational and environmental limitations experienced by the participant.

Nutrition Related Health Problems

● Trends of General U.S. Populations As we prepare for the 1980's we see that the nutrition-related health problems of the U.S. population are changing. Today there is less under-nutrition than there was ten years ago and there is little in the way of deficiency diseases. 1/2/3/ However, even today many low-income people are still not getting enough to eat. While under-nutrition is still a real problem in low-income groups, there is also a creeping problem of over-nutrition. The over-consumption of saturated fats, cholesterol, salt, sugar, alcohol, and calories is beginning to show a strong relationship between diet and chronic diseases.

● CSFP and WIC Target Population - The CSFP and WIC Program were started in response to public concern about hunger in America and the realization that pregnant and breastfeeding women and infants and children from low-income families are at special risk for under-nutrition. These groups have additional nutrient requirements associated with growth and development.

● Pregnant Women - The HANES and the DHEW Ten-State Nutrition Surveys found that there were no clinical signs of micronutrient deficiency for pregnant women. 1/2/ However, biochemical evidence indicated that iron and folic acid levels were low, especially for black and low-income women. Dietary data substantiated these findings. For low-income black women, the lower intake of iron was due to the inadequate intake of total calories rather than the lower iron content of foods consumed. These findings are not surprising since during pregnancy the requirements for iron and folic acid approximately double normal values. It is very difficult to meet the requirements for iron and folic acid from the food in a regular diet. Dietary data also indicated low intakes of vitamin A and C. Other studies have shown that low socioeconomic status women have marginal to deficient intakes of zinc. 5/

The most recent USDA Food Consumption Survey (1977) indicates that energy consumption is down by about 20 percent, with an average value of 1500 calories for adult women. 4/ The RDA is 2,000 calories per day with a range from 1600 to 2400.* This means that the average woman is consuming less than the lower limit of the RDA. Caloric intake during pregnancy must ensure adequate weight gain throughout pregnancy. Inadequate weight gain puts the woman at risk for having a low birth weight baby.

A reduction in total caloric intake can also mean a reduction in nutrients. Therefore, it is vitally important that pregnant women eat more nutrient-dense foods. The problems of over-nutrition are also important for pregnant women. Obesity, hypertension and diabetes are examples of nutrition related problems which can contribute to complications in pregnancy.

*Recommended Dietary Allowances, Ninth Edition (1979, in press)
for female age 23 to 50 years.

● Infants - National health statistics indicate that infant mortality and low birth weight continue to be primary health problems, especially among low socio-economic status populations. The 1979 Surgeon General's Report Healthy People has as major goals the reduction of the infant mortality rate and the number of low birth weight infants. Two thirds of the infants who die weigh less than 5.5 pounds (2500 grams). 6/ Low birth weight babies have more neurological and physical handicaps and mental retardation. Inadequate prenatal nutrition is one of the major factors associated with infant mortality and low birth weight.

The Ten-State Nutrition Survey found that the dietary intake of infants was adequate for all major nutrients except iron. However, the intakes contained a wide range of values including low values for calories and vitamins A and C. 1/ Other studies have shown that low socio-economic status infants also have marginal to deficient intakes of zinc. 5/

In addition to the problems associated with under-nutrition, some infants also suffer from problems associated with over-nutrition. Infant obesity has been associated with increased bottle feeding. It has been hypothesized that mothers may coax their babies to finish a bottle rather than take the baby's cue that she/he has had enough. 7/ The early introduction of solid food has also been associated with obesity.

Many of the problems with the over-consumption of salt and sugar by infants have been solved by the elimination of these additives from commercial baby foods. However, there continues to be a problem with home-prepared baby foods. In a recent study on the sodium concentration of homemade baby foods it was found that samples of homemade foods had two to three times the amount of sodium as commercial products. 9/

● Children - A preschool nutrition survey (1970) found that there are minimal overt signs of nutritional deficiencies in the preschool population. 8/ However, dietary and biochemical data showed that for low socio-economic groups, the overall quality of the diet was poor and there were particularly low values for iron. Low values for iron were found to be due to an inadequate intake of calories. The HANES and the Ten-State Nutrition Survey data also showed low values for vitamin A for low-income blacks and Spanish speaking children. The preschool nutrition survey found that a high percentage of low-income children were being given vitamin supplements. All three surveys found that among low-income children there was an increased incidence of children of small size for their age.

The Surgeon General's Report (1979) states that the main problems for preschool children are problems associated with the over-consumption of calories, sugar and fat. 6/ The report states that "Obesity -- a risk factor for hypertension, heart disease and diabetes -- frequently

begins during childhood." About one-third of today's obese adults were overweight as children. An obese child is at least three times more likely than another to be an obese adult. The over-consumption of fat is also a concern because there is evidence of the development of coronary arteriosclerosis in teenagers. The reduction of fat consumption by children may reduce the level of fat in the blood and thus reduce the risk of heart disease. The over-consumption of sugary materials greatly affects the dental health of children. Tooth decay begins about age three with the appearance of primary teeth.

Delivery of Nutrition Education

Nutrition education must be an integral part of the CSFP and WIC Program to ensure that the foods which have been prescribed to help the participant are actually used to promote his or her health, rather than eaten by other family members. The participant is at a critical stage of growth and development in the total life cycle. Therefore, the short term goals of nutrition education must deal with the immediate needs of adequate growth and development for the individual. Long term nutrition education goals need to encompass the entire life of the individual. For women this will serve to improve the outcome of future pregnancies by increasing nutritional status and by reducing certain risk factors which could complicate future pregnancies. For infants and children long term benefits will help to establish good eating habits which will continue to ensure adequate growth and development throughout life and, will limit the development of diet related diseases.

● WIC Requirements During each certification period, each participant is to have at least one basic contact plus either a secondary contact or a high risk contact.

The basic contact includes the explanation of one or more of the following topics: 1) Any special nutritional needs of participants and ways to achieve an adequate diet; 2) The importance of supplemental foods being consumed by the participant rather than by other family members; 3) The use of the Program foods as a supplement rather than a total diet; 4) The nutritional value of the supplemental foods; and, 5) The importance of health care. In addition, all pregnant women must be encouraged to breastfeed their infants. Also, appropriate guidance should be provided to all parents to assist them in meeting the dietary needs of their infants and children.

Secondary and high risk contacts are more individually oriented sessions which may include a discussion of the participant's specific nutritional needs and the relationship of one's diet to health. The high risk contact formalizes development of an individual nutrition care plan.

● CSFP Requirements The CSFP Regulations require that nutrition education include all of the subject matter areas as listed above for the WIC basic contact.

Focus of Workshop

A mass media extravaganza by Dr. Sarah Short and an innovative live arts performance by Bill Wood (Franklin the Good Food Friend), were presented at the initial general session of the national meeting. These excellent nutrition education presentations served to set the stage for the workshops. The workshops provided a forum for workshop attendees to: 1) Discuss the general session presentations; 2) Make recommendations concerning nutrition education issues raised; and 3) Share their State's most innovative nutrition projects.

The two innovative methods of nutrition education were presented at the national meeting in response to a recommendation made at the September 1979 National Conference on Nutrition Education. At that conference, the task force on pregnant women and children recommended that "In order to promote and maintain the health of pregnant women, infants and children, today's nutrition education messages and their method of delivery must be substantially changed." The task force stated that the nutrition education message must grow out of a recognition of nutrition's role in total health and lifestyle, taking into account the need for individual and social responsibility in carrying out this role. The delivery system needs to promote attitudinal and behavioral change rather than merely disseminate information.

Traditionally, nutrition education for the CSFP and WIC Program has been centered around the professional nutritionist who understands that in order to improve the participant's dietary practices, many factors must be considered. These include cultural, biological, psychological and socioeconomic factors. The nutritionist acts as a "change agent" by motivating the participant to gain the knowledge, skills and self-assurance necessary to practice new behaviors and experience the long term benefits.

As we move into the 1980's we need to strengthen this change agent approach by using more effective techniques of bringing about behavior change in the CSFP and WIC target population. These techniques will expand the traditional context of nutrition education to include teaching methods from social psychology, anthropology, economics, marketing, and advertising. The principles of marketing will need to be applied in the design of relevant messages. Approaches will need to be aimed at specific diet related behaviors such as exercise, self-awareness, and self-control. Nutrition education messages will need to be reinforced in settings beyond the local agency, such as in schools, in homes, in the market place, and with mass media.

Workshop Recommendations

Workshop attendees were very enthusiastic about using mass media and live arts for nutrition education in the supplemental food programs. The following recommendations emerged from the workshops:

- FNS should develop innovative nutrition education materials at the national level.
- FNS should develop slide-tape presentations, video-cassettes, public service announcements, and commercials for distribution to State and local agencies.
- A manual outlining how to implement live arts nutrition education should be developed for local agencies. The manual should include sample scripts.
- FNS should develop a system for the exchange of nutrition education ideas and materials.

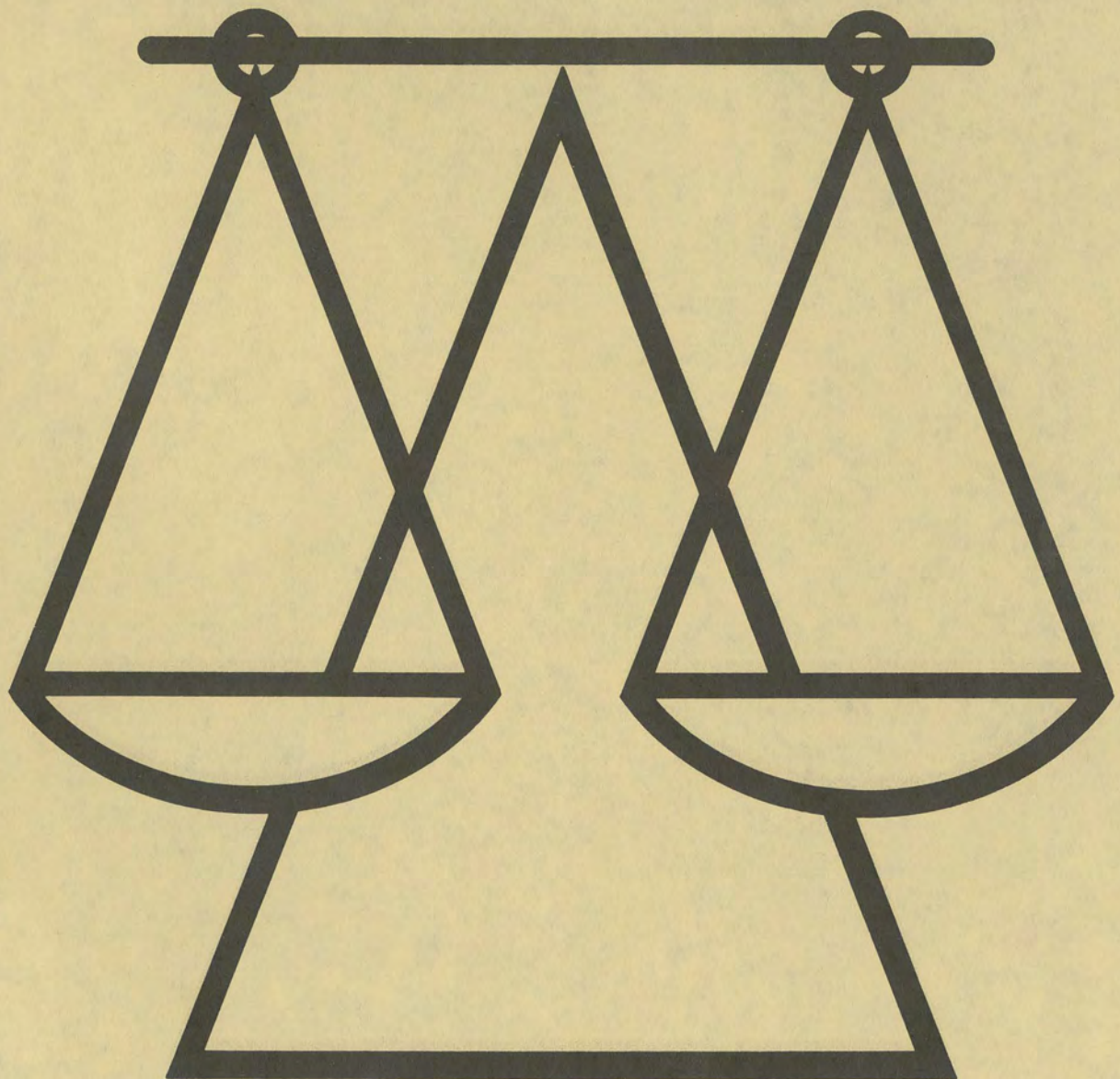
Nutrition Education Information

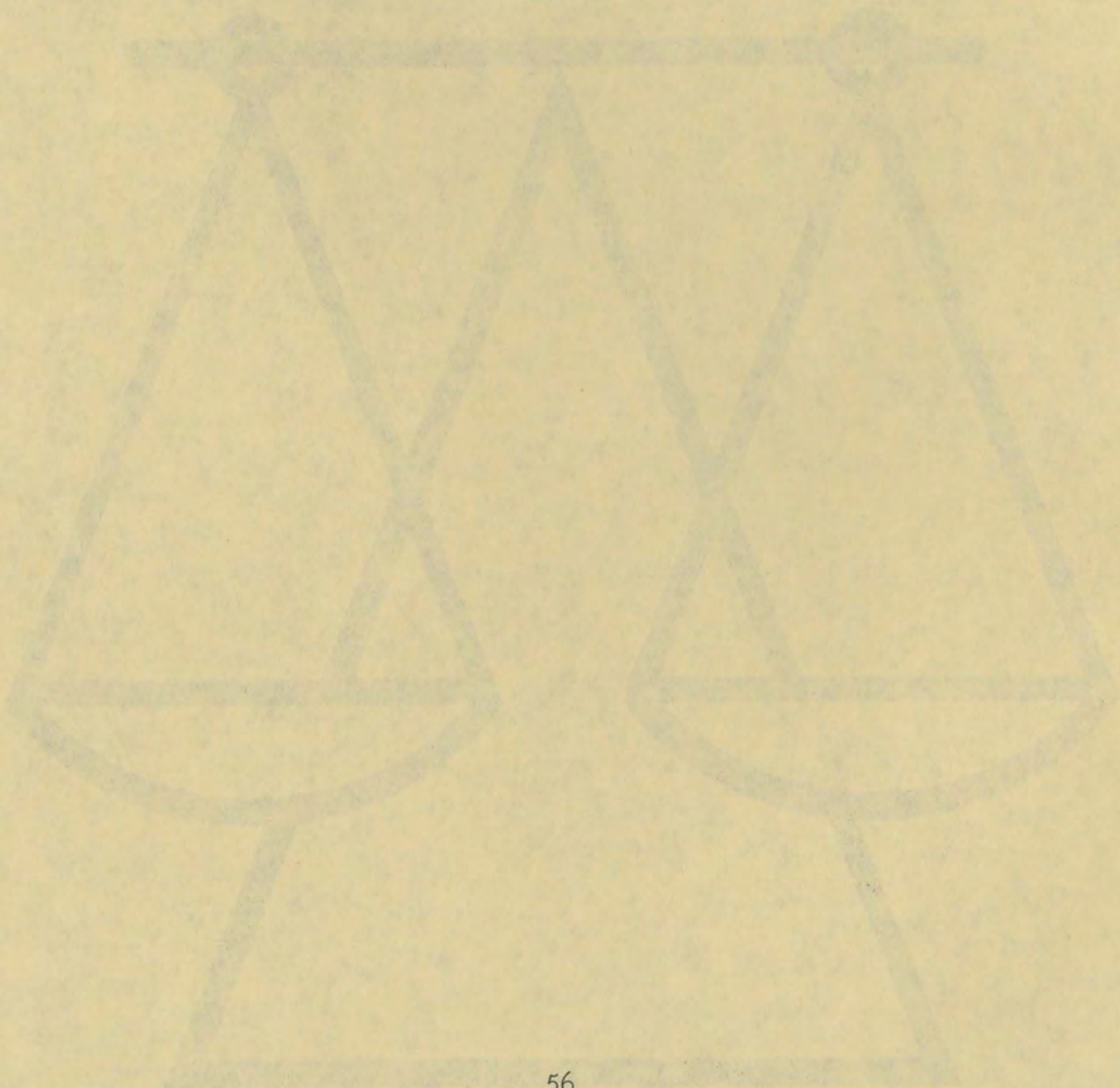
Innovative State and local agency nutrition education materials can be sent to the Food and Nutrition Information and Educational Materials Center, National Agricultural Library, Room 304, Beltsville, Maryland 20705 in care of Robin Frank. Copies of these materials can then be made available for loan. In addition, State and local agencies wishing to share innovative nutrition education materials are encouraged to forward copies of the materials to the Supplemental Food Programs Division, Food and Nutrition Service, USDA 20250. At the national office the materials will be useful in the development of national nutrition education materials and to promote nutrition education at conferences and meetings.

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CIVIL RIGHTS





CIVIL RIGHTS

Background of Title VI of the Civil Rights Act of 1964

In the early sixties, an increased awareness of individual rights resulted in the Civil Rights Act of 1964 which was launched by the Federal government as an attack against racial discrimination. Title VI of the Act prohibits discrimination on the basis of race, color or national origin. This title was designed to ensure that Federal funds are spent in accordance with the Constitution. It enunciates the basic principle that Federal funds should not be used to subsidize discrimination.

Section 601 sets forth the basic national policy which controls the other provisions of Title VI. By its terms, discrimination on the basis of race, color, or national origin is prohibited in any program or activity receiving Federal financial assistance.

Section 602 is the body of Title VI. Congress intended that the procedures set forth in this section would ensure fair, consistent and flexible application of the principle of nondiscrimination. This Section directs every Federal Department or agency providing financial assistance to issue rules, regulations or orders of general applicability. Where an agency receiving Federal funds fails to comply with such rules, informal voluntary compliance must be sought. If this is unsuccessful, the Federal agency may effect compliance by a termination of assistance to the offending program or activity. Any action to terminate funds must be based on an express written finding of noncompliance after opportunity for a hearing.

Section 603 provides that any action taken pursuant to Section 602 is subject to judicial review.

Section 604 prohibits discrimination in employment practices when the primary objective of the Federal financial assistance to the receiving agency is to promote employment.

Section 605 provides for protection of existing authorities with respect to Federal assistance extended by contract of insurance or guaranty.

General USDA Requirements

As a result of the Civil Rights Act of 1964 each Federal agency, including USDA, prepared regulations defining how the Act is to be implemented. The USDA regulations require the following:

- Written Assurance - Every State agency application for participation in program benefits must be accompanied by a written assurance agreement that the applicant's program will be operated in compliance with all requirements of the USDA regulations.

- Public Notification - The State agency is required to ascertain that all eligible persons, and particularly minorities, are adequately informed through specific action and encouraged to participate in the program. The State agency is also required to provide information on the USDA nondiscrimination policy and procedure for filing a complaint.
- Complaints - The State agency is responsible for an awareness of the proper handling of complaints and shall not intimidate, coerce, threaten or discriminate against an individual because that person has filed a complaint. The identity of complainants shall be kept confidential.
- Participation Data - The State agency is required to have available racial and ethnic data showing the extent of minority participation and potential participation in the program.
- Records and Reports - Each State agency must keep complete and timely records and must make this information available to personnel for review purposes. Failure to furnish such information should be noted in the report.
- Employment - The employment practices of a State agency must not adversely effect the delivery of program benefits and services.
- Site Selection - In determining the site or location of facilities, the State agency may not make selections with the purpose or effect of excluding or denying participation in the Program benefits.
- Affirmative Action - The State agency must take affirmative and corrective action to overcome the effects of past discrimination. Even in the absence of prior discrimination, the State agency may take affirmative action to eliminate conditions which could result in discrimination.
- Non-English Language Provisions - Where a significant number or proportion of the population eligible to be served needs service or information in a language other than English in order to be informed of or to participate in the program, the State agency shall take reasonable steps to provide information in the appropriate language to such persons.

Specific USDA Requirements

The State agency shall not, based on race, color, or national origin:

- Deny an individual any service, financial aid, or other benefit provided under the program.
- Provide any service, financial aid, or other benefit, to an individual which is different or provided in a different manner, from that provided to others under the program.

- Subject an individual to segregation or separate treatment in the manner in which service is provided.
- Restrict an individual in any way in the enjoyment of any advantage or privilege enjoyed by others.
- Treat an individual differently from others in determining whether that person satisfies any admission, eligibility or other requirements which individuals must meet in order to be provided service.

Civil Rights Workshop

The Civil Rights workshop was conducted by Edward O. "Pete" Lee, a senior partner of M.T.O. and Associates. Mr. Lee has provided extensive training and technical assistance to numerous organizations since becoming a full time consultant in 1970. The remainder of this chapter summarizes the content of Mr. Lee's presentation.

Mr. Lee opened the workshop by explaining that he hoped to open our minds to the need for basic civil rights for all minority groups, including the rights of impoverished whites which are often overlooked in discussions of civil rights. He explained that each person employed in any phase of program operations must be aware of the needs of minority groups. Program administrators must also be aware that as times change, the expectations and demands of minority groups shift. For example, in the 1960's minority groups attained "empowerment" by organizing, defining themselves, and expressing to society at large who they were and what labels should be applied to them. Now that empowerment has been realized, Mr. Lee warned that empowered groups will be directing increased attention toward other matters such as their expectations of services they should receive from Federal programs such as the CSFP and WIC Program.

Change always occurs when: (1) Someone or some group has identified a problem; and (2) Someone or some group has developed a solution which will result in improvement.

Program operations must be revised to accomodate change. Change is constant and all Program administrators are "change agents." As change agents, administrators should be aware of the following facts about change:

- People change more in response to emotions than in response to logic or reason.
- Some disturbance will accompany all change, regardless of how minor the change.
- Effective change must be accompanied by shared responsibility and staff members must be convinced that in some way they will benefit from the change.

- Change agents cannot expect to be liked. Employees or other individuals who are required to make changes will resent the change agent. Such resentment should be anticipated and should not be taken personally by the change agent.

Three Primary Factors Affecting Resistance to Change

(1) Who suggests the change.

- Resistance to change is less if staff sees change as their own idea rather than the idea of an outside force.
- Resistance is less if the change has the wholehearted support of top level officials in the organization.

(2) What kind of change.

- Resistance is less if staff sees the change as reducing rather than increasing their current workload.
- Resistance is less if change is in accord with staff members' basic values and ideals.
- Resistance is less if staff autonomy and security are not threatened.

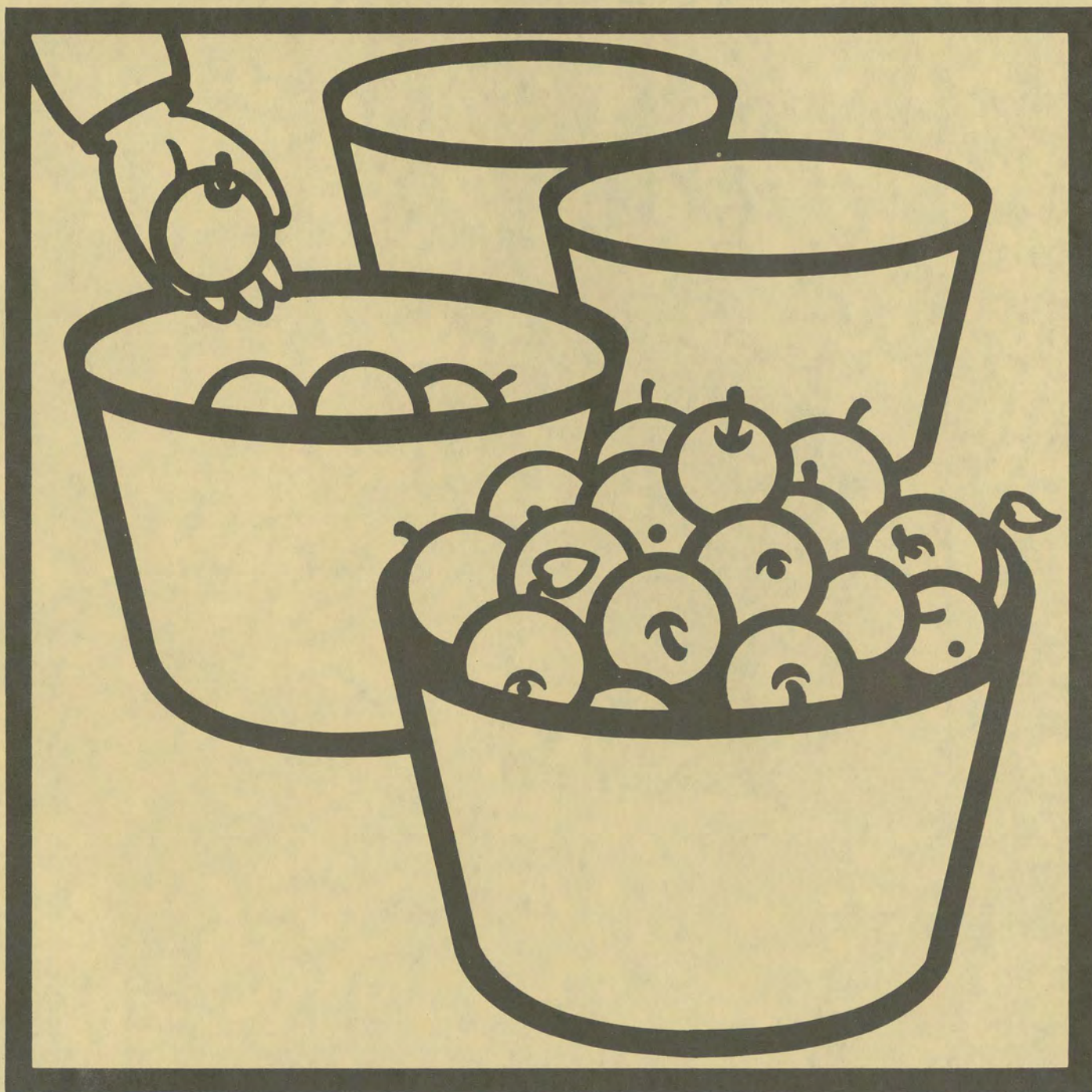
(3) Procedures used to make the change.

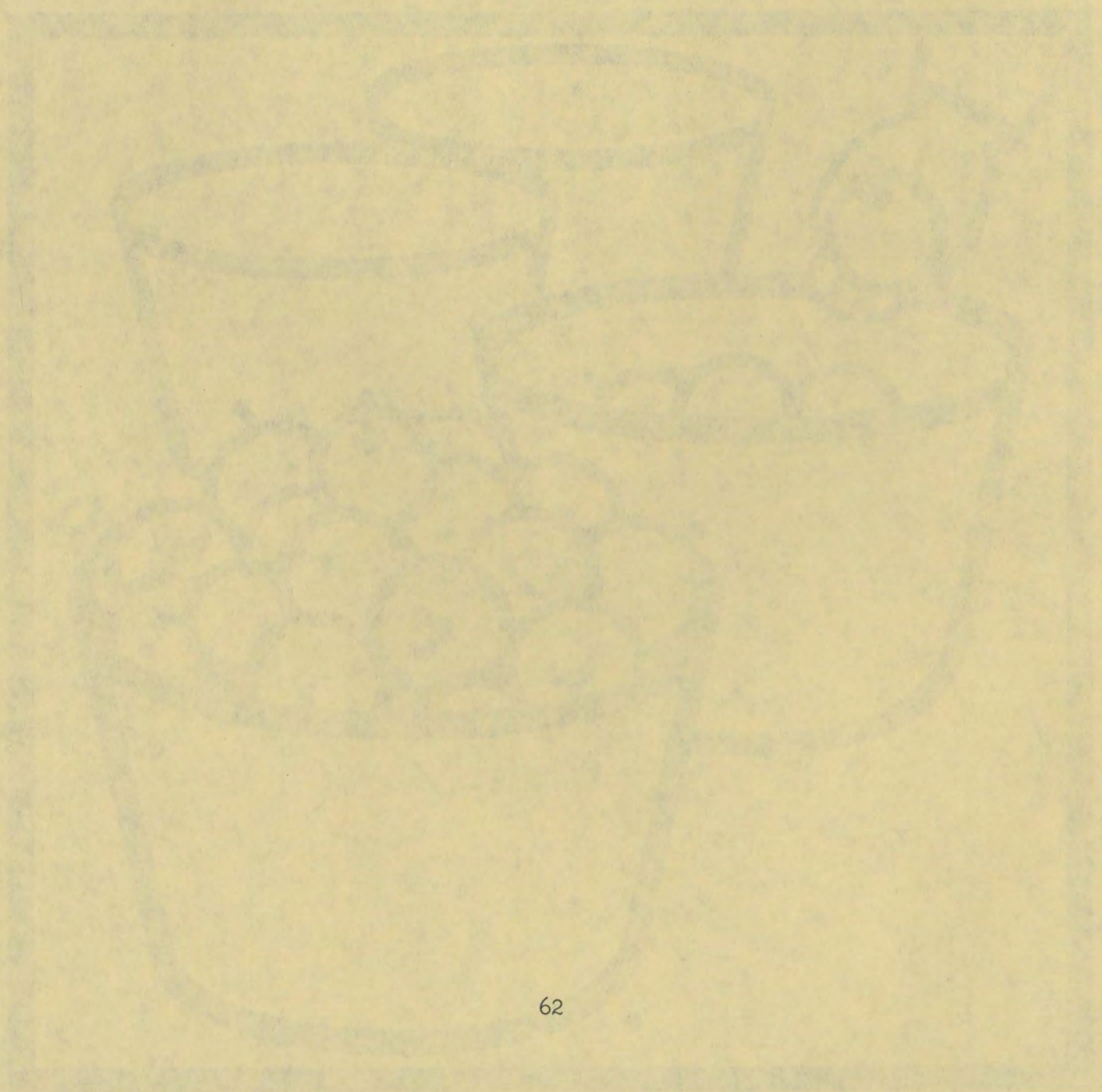
- Resistance is less if staff is involved in diagnosing the need for change and defining the importance of the change.
- Resistance is less if the change agent empathizes with opponents of the change, recognizes valid objections to the change, and takes steps to eliminate or reduce such objections.
- Resistance is less if an environment is created which allows for trust, confidence and acceptance of the change agent.

Dangers of Resistance to Change

Mr. Lee recommended that all program administrators at National, State and local agencies heed the requests of minority groups rather than suffer the adverse effects of negative publicity which can be created by agitated minority groups. Mr. Lee pointed out that negative publicity about federal programs can affect public opinion. This in turn can affect Congress and the amount of federal funding appropriated for a specific program. Members of Congress are concerned about public opinion. In addition, members of Congress are very aware of the voting power of minorities and are aware that the outcome of an election can be determined by a relatively small but well organized group.

MIGRANTS





DELIVERY OF SERVICES TO MIGRANTS

Background

Despite the contributions made by migrant farmworkers to the national economy and food supply, migrants and seasonal farmworkers have often been overlooked by society. They have historically suffered from low wages, difficult working and living conditions, and the lack of adequate health services and education. Migrant families, consequently, suffer from the typical symptoms of chronic poverty, including being ill-fed, undereducated, and poorly housed. While not all migrant farmworkers face poverty conditions of this nature, a majority do.

The economic plight of migrants is well known. The nutritional vulnerability of migrants is well documented, and one of the Department's major concerns is the effect such nutritional vulnerability has on the health of pregnant and breastfeeding women and infants and children in the migrant populations. A survey conducted in May 1977, as part of a report to the Legal Services Corporation, reported that more than fifty percent of the States in the United States were cited as the home base State by migrant farmworkers. Thus, personnel in States not traditionally considered to be home base for migrants should be aware of the migrant workers in their State and the issues which concern their participation in the CSFP and WIC Program.

The Department is concerned with improving the accessibility of CSFP and WIC Program benefits to migrant farmworkers. This concern has been stimulated by various studies which have indicated a serious need for increased benefits. For example, studies on migrants have established the following facts:

- Infant mortality rate 24 percent higher than national average.
- Incidence of infectious diseases 20 percent higher than national average.
- Births outside hospitals at a rate nine times higher than national average.
- Hospitalization for accidents twice as high as national average.
- Incidence of malnutrition (prenatal, postnatal and childhood anemia) higher than any other subpopulation in country.

Workshop Objectives

A variety of factors may hinder the delivery of WIC and CSFP benefits to migrants. Although the Department has taken steps to provide additional funds and materials, and strengthened regulatory provisions with the goal of improving delivery of services to migrants, there remains a need for further improvements. At this workshop additional ways of reaching migrants, within the context of current legislation and regulations, were discussed. State agency representatives also discussed their major problems with providing services to migrants.

Definition of Migrants

A major issue discussed during the workshops was the definition of the term "migrant farmworker." There are several definitions currently in use by various government programs. The confusion surrounding the definition creates problems for State agencies in both estimating the total number of migrants in their States and in counting migrants for the WIC Program monthly participation reports. Categories of farmworkers identified at the workshop included the following: (1) Interstate migrants, those who leave their state of residence and move through other States. (2) Intrastate migrants, those who move within a State and may temporarily relocate or be gone from place of residence overnight. (3) Seasonal farmworkers, those who live in one place but work the crops on either a seasonal or year-round basis. (4) Day haul workers, those who live in one State but who travel on a daily basis into another State to work in truck gardens.

State agencies acknowledged that seasonal farmworkers are easier to identify and serve because they remain in one area, are often more familiar with available local services, and should be included as part of the regular caseload for funding purposes. The big problems exist with identifying the number of interstate migrants who enter an area and identifying intrastate migrants for reporting purposes.

Workshop attendees were divided on the question of whether FNS should establish a definition for a migrant farmworker for CSFP and WIC Program purposes. Some thought that a definition would help them in counting migrants for requesting WIC Program special migrant funds and for reporting purposes. They requested that a definition, if adopted, be consistent with definitions used by other Federal programs. Other attendees were extremely opposed to USDA defining migrant farmworkers because they said it would reduce their flexibility.

Locating and Serving Migrants

A major problem discussed at the workshops was the State or local agency's inability to locate migrants and to provide them with program services. The provision of services is difficult both initially and as the migrant relocates. The following difficulties were experienced when State agencies tried to locate and serve migrants:

- Outreach. Most States cited problems with reaching small pockets of migrants sparsely scattered throughout the State. States have fewer problems finding migrants when there are large numbers concentrated in one area and when there is a strong local Migrant Council or Farmworkers group present.
- Transiency. Migrants are sometimes in an area for a short period of time, and if there is no work or a crop failure, they often move on without stopping to seek services.
- Employer Hostility. The hostility and protectiveness of crew chiefs, growers, and camp managers often hamper the delivery of benefits or even the distribution of outreach materials in migrant camps. It was pointed out that sometimes these individuals fear that migrants will take time from work to seek services, or that they "may get on programs and drop out of work." Since the growers control the housing and often own the labor camps, it is usually necessary to obtain their permission to go into the camps.
- Local Agency Resistance. Some local agencies resist working with local migrant farmworker groups because they are transitory and each year the local agency has to start all over again with a different group. Some local agencies resent having to make the extra effort to bring migrants into their program. Sometimes outreach efforts are difficult because local farmworker groups are not well organized or identifying potential WIC Program participants is not one of their priorities. The latter would be the example of a farmworker organization funded by the Department of Labor to focus on migrant employment and training.
- Migrant Resistance. Some States report that migrants are reluctant to come into clinics that are not migrant health clinics.
- Migrant Indifference. Migrants may perceive the WIC Program as simply a food program or welfare program, rather than a program which also offers nutrition education and the resultant long-term benefits of health care. Some utilize the WIC Program for short periods of time, but if their situation improves slightly they do not return the next month.

● Work Schedules. Migrants often will not take time from their work in the fields to seek health care when they are not sick, and thus may not take advantage of the types of preventive services offered by many local agencies participating in the WIC Program.

Suggestions made at the workshops for overcoming these difficulties are described in the following paragraphs.

Outreach

It was emphasized throughout the workshops that to reach migrant farmworkers, State and local agency administrators generally could not expect the migrants to come to the clinics, but must use outreach and go to the migrants. Migrants are following crops, not following programs. Most women will not leave paid employment in the fields to seek supplemental food program benefits. The loss of pay seriously minimizes program benefits since migrants need money for rent, electricity, gas and other living expenses. Employment and wages are the reasons farmworkers migrate, and, when they are harvesting crops, they will stay in the fields each day as long as they can. Given this reluctance to miss work, the following suggestions were made to reach and serve migrants.

● Public Media. Publicize the availability of the CSFP and WIC Program in the community and use every type of media available. Home base states especially should use all the media such as television, radio, and newspapers to publicize the programs so migrants will be interested in making application for benefits both at home and when moving upstream. When migrants are at their home base, their lives are more stable and they have more time to find out about programs and services. That is when initial access to the program and delivery of nutrition education are the most effective.

● Posters. Put outreach materials in schools, food stamp offices, supermarkets, laundromats, Headstart Centers, and any place in the community where migrant farmworkers might see them.

● Visit Campsites. If it is possible to gain access to the camps, in the evenings, go out and knock on doors in the camps or, during the day, talk to families as they are working the fields. Determine, if possible, the appropriate people to contact to reduce the reticence of crew chiefs, growers and camp managers.

● Influential Migrants. Identify and locate the leaders in the migrant community itself, ask for their assistance and provide them with program information and outreach materials. Usually there is at least one individual in the migrant community who can speak English and who helps other migrants with problems. That English-speaking person can be a very effective conduit for program information.

● Farmworker Organizations. In areas where there is a strong farmworker organization, work through them. Additionally, a State or local agency might contract with a farmworker organization for the purposes of hiring outreach workers. This is particularly effective if the individuals doing the outreach are farmworkers or former farmworkers.

Certification

In an effort to facilitate certification of migrants, FNS included the following provisions in the current WIC Program Regulations.

● Expedited Service. Rapid processing of applications is required for migrants who are planning to leave the jurisdiction of the local agency where they are certified. Such migrants must be notified of their eligibility or ineligibility within 10 days of the date of their first request for benefits. Most other applicants must be notified within 20 days.

● Bilingual Requirements. Bilingual staff must be available to serve persons wherever a significant proportion of the population of an area served by a local agency is non-English speaking. Local agencies are encouraged to hire bilingual paraprofessionals from the community during migrant seasons. In addition, FNS has prepared and distributed resource materials which may be used in agencies serving migrants. Among these are a nutrition education slide series available in both Spanish and English and the WIC Migrant Handbook which was distributed to WIC State and local agencies. It provides information relating to migrants in general as well as possible resources to assist local agencies in better serving migrants. Such topics are: Migrant Farmworkers - Who are they and why the concern; Migratory Patterns, factors hindering the delivery of services and a discussion of how these barriers can be overcome; and a list of migrant health agencies. In addition, a film on breastfeeding and another on feeding infants, produced by the Society for Nutrition Education, are being translated into Spanish.

One workshop attendee explained that in one State an effective method of assisting migrants had been discovered. That State agency hired bilingual staff to travel through their State with the migrants to help facilitate their obtaining services.

● VOC Cards. To maintain continuity of benefits throughout the certification period, every State agency must ensure issuance of verification of certification (VOC) cards to every WIC Program participant who is a member of a migrant farmworker family. When a migrant relocates, local agencies are required to accept the VOC card as proof of eligibility and if caseload space exists, to provide benefits until the certification period ends. In addition, if the local agency to which the migrant transfers is at maximum caseload, the migrant participant must be placed at the head of the waiting list regardless of nutritional risk priority ranking.

At the workshop many criticisms emerged regarding the use and design of VOC cards. The criticisms were as follows:

- Many migrants are not given VOC cards and arrive upstream without them.
- There is no record of food package issuance on the VOC card.
- The VOC card contains insufficient information about nutritional risk conditions and health information.
- Often the VOC cards are incomplete and are missing data such as the original certification date or the expiration date.

Workshop attendees explained that although acceptance of the VOC cards does speed up enrollment, local agency personnel must still prescribe a food package, explain the differences in food delivery systems from one State to another, and explain the differences in facilities between local agencies. All of these problems are compounded when VOC cards are incomplete and upstream local agencies have to spend time contacting the original certifying agency to obtain the missing information.

Scheduling Appointments

Local agencies should know the growing patterns of crops in their area. Migrants may have available time in between the weeding, thinning or cleaning of certain crops. Often all growers irrigate at once and that becomes another free period of time for farmworkers. Rainy days are another good time for outreach efforts and for the delivery of service. Local agencies should also be familiar with the kinds of situations, such as crop failures, labor disputes and truck strikes, which affect migrant movements. This type of information may allow local agencies to schedule regular appointments around periods of a high influx of migrants. In addition, local agencies should be flexible in their clinic hours and possibly reschedule other appointments to take advantage of times when the migrants are not working.

Nutrition Education

Workshop attendees felt that the major barriers to effective nutrition education for migrants are language problems, migrant attitudes and the limited time available with migrants. Migrants work very hard when they are in the migrant stream and they are reluctant to spend their spare time on nutrition education. The following suggestions emerged from the workshops:

- Residence States. Home base States need to do more in terms of providing nutrition education during times when migrants are unemployed. Migrant farmworkers have more time available and are more more receptive to nutrition education if it is delivered during their periods of unemployment.
- Migrant Campsites. If possible, gain access to the camps, provide nutrition education there, build up rapport and create a climate in which nutrition education can be accepted.
- Limit Length. Design the nutrition education sessions to last no more than one-half hour.
- Subject Matter. Tie nutrition education in with the supplemental foods which have been provided. Identify a few priority messages and stress them.

Health Care

The importance of proper health care should be stressed in all contacts with migrants as well as in all outreach and informational materials. The benefit of regular ongoing health care must be emphasized, especially in home base States so that migrants will seek necessary health care while traveling in the migrant stream.

Funding

Funding complexities represent another issue specific to the administration of the WIC Program for migrant participants. All State agencies agree that in terms of administrative costs, it is more expensive to provide program benefits to migrant farmworkers than to other participants. Some of the reasons cited for the additional expense are as follows:

- Outreach efforts
- Bilingual staff and materials
- Visiting migrant camps
- Extending clinic hours
- Mobile vans
- Additional efforts necessary to provide and explain all program services.

Workshop Recommendations

In addition to the general recommendations made in the workshops, the following suggestions were directed at FNS.

- Data Exchange FNS should determine the feasibility of a data exchange of the information available through the Migrant Student Record Transfer System and the National Migrant Referral Project, Inc. Workshop attendees felt that the information could be used to develop a medical communication network and to obtain data for recording the number of migrants.
- Additional Administrative Funds. FNS should evaluate the additional effort required to serve migrants because of their unique work/life styles and, consider providing a higher percentage of administrative funding in the special migrant grants.
- Transfers of Certification. FNS should encourage the increased issuance of VOC cards in home base States and to intrastate transferring migrants. FNS should also consider a redesign of the Federal VOC card and/or consider issuing additional guidance on the use of the card to minimize errors made in its completion. (FNS is in the process of redesigning the Federal VOC card and issuing an instruction to accompany the new card.)

Conclusion

As mentioned at the beginning of this chapter, migrant farmworkers are particularly affected by nutritional vulnerability. FNS is extremely concerned about improving the health and welfare of the migrant population. In fiscal year 1979, FNS awarded contracts for two developmental projects directed at the migrant population. Each of these projects is currently underway and is briefly described below.

The National Child Nutrition Project in New Jersey will evaluate the health and social services provided to migrant populations in New Jersey. Utilizing the data collected, the most successful methods of bringing migrants into the WIC Program and the cost effectiveness of these methods will be identified. The methods will be integrated into a model which will outline the steps to be used for increasing participation of migrants in the WIC Program. The model will be replicable in rural areas throughout the country.

The Michigan Department of Public Health will evaluate the effect of the WIC Program on the utilization of health services in rural areas and among migrant farmworkers. The evaluation will consist of a record audit, participant and health provider surveys, and a comparison of WIC Program sites utilizing onsite integrated service delivery versus utilizing a referral system. The findings and recommendations which result from this study will be submitted to FNS.

INDIAN STATE AGENCIES



INDIAN
STATE
AGENCIES



INDIAN STATE AGENCIES - ISSUES AND NEEDS

BACKGROUND

American Indians were first specifically included in the WIC Program under Public Law 93-150, which was effective November 7, 1973, and was subsequently amended by Public Law 95-627. The WIC Program regulations based on the law describe an Indian State agency as an Indian tribe, band, or group, recognized by the Department of the Interior; an intertribal council or group which is an authorized representative of Indian tribes, bands or groups recognized by the Department of the Interior and which has an ongoing relationship with such tribes, bands or groups for other purposes and has contracted with them to administer the Program; or the appropriate area office of the Indian Health Service (IHS). As of February 1980, there were 28 Indian tribes approved as State agencies. (A listing of these agencies is provided later in this chapter.) There are no CSFP Indian State agencies; but, two reservations are served by CSFP. The fiscal year 1980 estimated WIC Program funding level for Indian State agencies is \$8,036,335. This represents a funding increase of approximately 18 percent over fiscal year 1979. Additionally, other State agencies serve Indians as part of their own administration of the Program.

WORKSHOP

The issues and needs discussed at the Indian workshop were determined primarily by two recent surveys of the WIC Tribal agencies. The first survey was conducted in October 1979, by Linda White, the Indian State agency representative to the National Advisory Council on Maternal, Infant and Fetal Nutrition. The second survey was conducted in November 1979, by the Inter-Tribal Council of Nevada in conjunction with the Children's Rights Group.

The following paragraphs list the concerns of Indian agencies as expressed in the two surveys and as discussed in the workshop. The concerns are listed in the order of importance as ranked in the survey done by the Children's Rights Group/Inter-Tribal Council of Nevada WIC Program.

● Indian State Agency Coalition

The primary concern expressed through the surveys was a belief that tribes do not have a communications network through which they can share successful ideas, identify and discuss solutions to common problems and recommend regulatory changes that facilitate tribal administration. The Indian agencies have collectively decided to form an Indian State Agency Coalition, through which they can share their common concerns and recommend regulatory changes that will improve their WIC Programs. The agencies elected a steering committee whose members will be planning

an Indian State agency meeting to be held in 1980. The Coalition plans to publish and distribute a newsletter to keep its members informed on the resolution status of the problem areas discussed throughout this summary. The Children's Rights Group offered to assist in the development and printing of the newsletter.

● Complexity of WIC Regulations

The second concern expressed was the complexity of the Federal WIC Regulations, and the perceived inapplicability of many of the regulatory provisions to Indian agencies. A suggestion was made that FNS provide more appropriate program guidance for Indian Agency State Plans, Procedure Manuals, and so forth.

● Insufficient Administrative Funds

The third problem identified in the survey was the inadequacy of the administrative funding levels for tribal agencies. A suggestion was made that FNS provide more technical assistance to tribes, to help them reduce their WIC Program operational costs. An assertion was made that nutrition education costs are especially difficult for tribal agencies to afford because of the additional expense of producing their own Reservation-oriented materials. Another factor affecting the adequacy of administrative funding levels was the ability or inability of IHS to provide certification services for the WIC Program. On those Reservations where IHS does not perform WIC certifications, it is difficult for Indian State agencies to provide adequate resources (equipment and personnel) within their administrative budgets.

● Nutrition Education Requirements

The Indian agencies assert that FNS is not providing adequate technical assistance in the area of nutrition education. Several tribal agencies will probably request a waiver of the regulatory qualifications required of the WIC Nutrition Coordinator, because of the extreme difficulty in recruiting qualified personnel for the Reservations. A similar problem area identified in the Indian agency surveys was the inability of the tribes to "attract and retain a nutritionist." It is important to note that the WIC Regulations recognize the special nutrition education needs of migrants and Indians, yet the Indian agencies feel unable to provide effective nutrition education without more effective assistance from FNS.

● Program Administration

The tribes feel they are not receiving sufficient technical assistance on WIC Program administration. Several specific administrative responsibilities were discussed, including financial management. Tribes feel they do not have access to the expertise needed to understand and interpret many of the financial management instructions and policies. One of the major criticisms of the FNS technical assistance efforts is that there

are no Native Americans at the Regional Office level to provide such assistance. The tribes feel that the effectiveness of the assistance is reduced or limited by cultural differences between Indian agency WIC staff and FNS technical assistance personnel. FNS too often attempts to provide the same assistance (using the same approach) to Indian agencies that it routinely provides to other agencies. In general, tribal agencies perceive an insensitivity to the cultural and administrative uniqueness of the Indian WIC Programs. The Indian State agencies encouraged any tribe not currently functioning as its own State agency to pursue that status, in keeping with the spirit of Indian self-determination.

● Insufficient Food Funds

The tribes believe the food funds allocated to Indian State agencies under the present formula are inadequate. The tribes contend that the statistics used in the formula do not meet the potential need on the Reservations. The Indian agencies would rather participate in a negotiated budgeting process than retain the formula process as it currently operates. The Indian agencies feel that FNS disregards the accelerated inflation rates of the WIC food package on the Reservation.

● Lack of Coordination Between Federal Programs

The tribes feel there is a lack of coordination between federal programs. They believe that tribes do not receive adequate services from IHS. They also think that WIC clinics should be more well-integrated with IHS' ongoing prenatal and child health service. The lack of coordination between WIC and IHS services has two deleterious effects on the delivery of benefits to participants: fragmentation of health services and duplication of efforts (primarily in clinical tests administered to participants for certification purposes). Further, the Indian agencies contend that local IHS offices do not fulfill many of the commitments made at the national level.

Other Concerns

Some general concerns that were voiced during the workshop include:

- The WIC food package is not well accepted by Indian participants.
- Tribal estimates of funding needs should be given more consideration by FNS.
- Reallocations have an adverse impact upon Indian WIC Programs. Participation variances due to weather, transportation availability, and other problems can result in needed funds being recaptured and reallocated.

- Late Letters of Credit are especially difficult for tribal agencies to deal with from an administrative standpoint. Cash flow crises materialize much sooner in smaller Programs.
- There should be more coordination between feeding programs on the Reservations, so that resources can be shared, where feasible, among those programs.
- A separate Procedure Manual is not necessary in those instances where an Indian State agency, with no local agencies, has written the State Plan to include all the necessary information.
- More Native Americans should be directly involved in the writing of regulations which affect their programs.
- FNS should establish an Indian desk in Washington to advocate on behalf of Indian agencies and their special needs and concerns.

FNS Commitments

The following specific commitments were made by FNS in response to the issues discussed during the Indian agency workshop:

- Work with IHS - FNS in Washington will discuss with IHS officials in Washington the problems mentioned previously in this summary. The tribal agencies will continue to work through their Tribal Councils in an attempt to alleviate the IHS service problems. Also, the National Advisory Council will continue to review the role of IHS and the degree to which the contractual role is being fulfilled.

The regional offices of FNS will work with regional IHS personnel to assist in resolving WIC problems. The Indian agencies were insistent that the commitment of IHS to the WIC Program needs to be strengthened at the Chief Medical Officer and Service Unit Director levels.

- Employment - FNS personnel will assist qualified Native Americans to apply for positions within FNS.
- Funding - FNS will continue to analyze the many funding issues discussed during the workshop.
- Nutrition Education - FNS will produce more culturally relevant nutrition materials.
- Statistics - FNS will continue to accept the statistics provided by Indian State agencies for use in the funding formulas. Acceptance of the best available tribal statistics is necessary because census data or other data sources available for States is not readily available for Indian populations. Further, if an Indian State agency furnishes updated

statistics in the course of the fiscal year, FNS will make an adjustment in the formula for that Indian State agency. Additionally, FNS will continue to make adjustments in the formula for Indian State agencies that are experiencing an increase in food package costs.

Developmental Projects

In fiscal year 1979, as one of the WIC Program Developmental Projects authorized by Public Law 95-627, a grant was awarded to the Papago Tribe. The Developmental Project is being conducted in Arizona by the Papago Nutrition Improvement Program and will provide a breastfeeding education model through a coordinated team approach with six other health agencies. The goal of the project is to increase breastfeeding among Papago women through an extensive support network. The grantee will provide FNS with the following three manuals: (1) A tested training protocol for field worker and staff; (2) A team approach model coordinating the services of numerous agencies for the purpose of solving a particular health problem; and (3) A model with tested components to demonstrate how the incidence of breastfeeding can be increased on other Indian reservations. A final report of the evaluation of this demonstration project will also be provided.

The second developmental project, funded in fiscal year 1979, and directed at Native Americans is being conducted by the North Dakota State Department of Health. That health department will develop and implement a Nutrition Aide Training Program for Native American students at the United Tribes Educational Training Center in Bismarck, North Dakota. The program will include training in basic nutrition education techniques and WIC Program information. The one-year program will include both academic and on-the-job training. A final report including results of the project and copies of materials developed for the program will be submitted to FNS.

CURRENTLY APPROVED WIC INDIAN STATE AGENCIES
as of February, 1980

<u>FNS Region</u>	<u>Indian Agency</u>	<u>State Where Located</u>
New England	1. Indian Township	Maine
	2. Pleasant Point	Maine
	3. Penobscot	Maine
Mid-Atlantic	4. Seneca Nation	New York
Southeast	5. Seminoles	Florida
	6. Choctaws	Mississippi
	7. Eastern Band of Cherokee	North Carolina
Southwest	8. Acoma	New Mexico
	9. 8 Northern Pueblo	New Mexico
	10. Isleta Pueblo	New Mexico
	11. Santo Domingo	New Mexico
	12. Six Sandoval	New Mexico
	13. WCD Enterprises	Oklahoma
	14. Choctaw	Oklahoma
	15. Cherokee	Oklahoma
	16. Chickasaw	Oklahoma
	17. Tonkawa	Oklahoma
	18. Potawatami	Oklahoma
	19. Zuni	New Mexico
Midwest	NONE	
Mountain Plains*	20. Shoshone & Arapahoe	Wyoming
	21. Ute Mountain Tribe	Colorado
	22. Winnebago	Nebraska
	23. Cheyenne	South Dakota
	24. Rosebud	South Dakota
Western	25. Standing Rock	North Dakota
	26. Inter-tribal Council of Nevada	Nevada
	27. Mauneluk	Alaska
	28. Fort Berthold	North Dakota

NOTE: The above list includes only those Indian areas approved as WIC Indian-State agencies. Many other Indian tribes serve as WIC local agencies under a State jurisdiction. Information on Indians being served within a State may be obtained from the respective State WIC Coordinator.

INDIAN AREAS CURRENTLY BEING SERVED
BY THE COMMODITY SUPPLEMENTAL FOOD PROGRAM

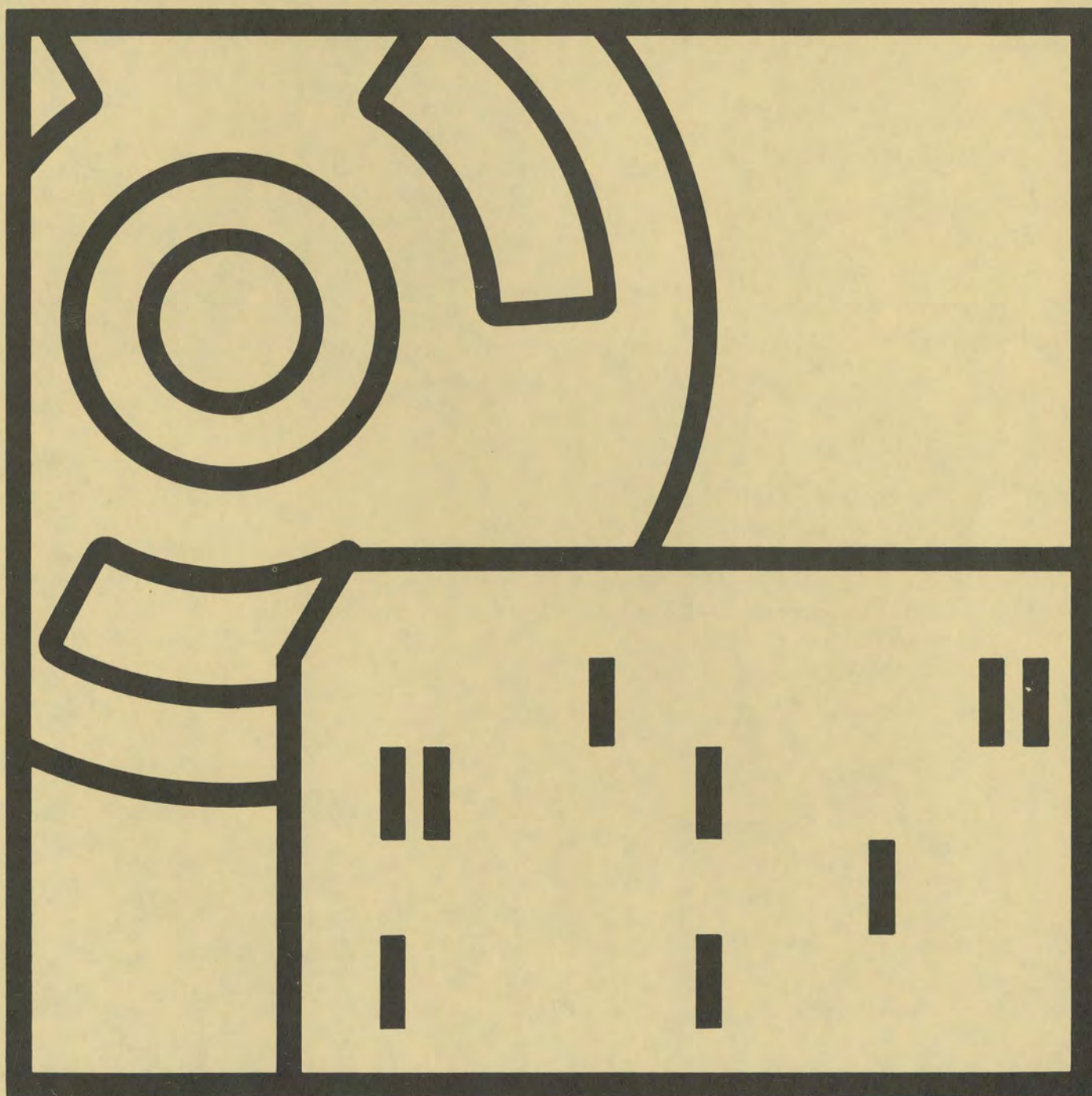
<u>FNS Region</u>	<u>Indian Agency</u>	<u>State Where Located</u>
Midwest	1. Red Lake Reservation	Minnesota
Mountain Plains	2. Pine Ridge Reservation	South Dakota

THE UNIVERSITY OF CHICAGO
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AUTOMATED DATA PROCESSING SYSTEMS



AUTOMATED DATA PROCESSING SYSTEMS

AUTOMATED DATA PROCESSING SYSTEMS

Background

Since 1977, WIC Program regulations have required procedures for the operation of food delivery systems which assure accountability and efficient operation. In order to implement these requirements, many State agencies acquired automated data processing (ADP) systems to handle the necessary tabulation of data. National guidance, coordination, and the control of development and use of WIC automated systems became a necessity when State agencies started using automated systems to help manage the WIC Program. The States' systems design and programming sometimes did not meet WIC Program management needs. The State designs and implementations were often dictated by the configuration of existing State hardware, and the software developed was often an adaptation of WIC Program needs to existing State financial systems. The multiple, and often duplicative, State efforts to design, program, and implement were costly and inefficient.

In September 1976, FNS began planning the development of a model system. In December 1976, a cooperative effort was started with the State of Connecticut to develop a system that would meet the States' needs and WIC Program requirements. The system design, programming, and implementation done in Connecticut became the basic framework for developing the national automated WIC system, known as the "National Model," which has been distributed to all FNS Regional Offices and to State agencies.

Some States are still using a manual system, others are using their own system or a system developed by private companies, and some are using a modified version of the National Model or another State's system. A listing of the ADP system being used in each State according to FNS records is located at the back of this chapter.

State Selection of a System

The use of automated systems by State agencies in the administration of the WIC Program is the cornerstone of program management and financial accountability. A good automated system coupled with effective use of the reports generated by the system, assure more than any other single component, that a State agency will make the best use of available funds in delivering Program benefits.

The importance of a successfully operating automated system has been demonstrated by WIC Program problems which have come to light in several States recently audited. Problems discovered in systems for vendor monitoring and in the overall food delivery system could have been minimized if more effective ADP systems had been in use. The issue of unspent funds also relates to poorly implemented automated systems. If ADP systems are not operating properly and accounting for participation and expenditures in a timely fashion, States do not know precisely how much money is being spent. Therefore, State agencies tend to underspend to assure staying within the grant level. Usually this is reflected by reporting inflated obligation levels, and as a result, large amounts of unspent funds are being returned to FNS.

It is a goal of FNS that States opting to automate their Program are able to efficiently choose a system most beneficial to their needs. All State systems currently in use differ. Each State's ADP needs vary at least slightly from every other State's needs due to management differences. There are substantial differences between State systems even if the States compared are using the basic National Model. Therefore, a most beneficial way for a State to know what system is best for its use is to utilize the expertise and knowledge of other States already using ADP systems.

States which already have an automated system have experienced the various steps involved in the adaptation processes. These steps include preparing advance planning documents, accepting bids for services from a systems company, and entering into contractual arrangements and agreements. Utilizing the resources of States with ADP systems, as well as the Regional Offices minimizes many of the problems previously experienced by States obtaining systems. In addition, many systems already in operation, such as those based on the National Model, may be transferable and, therefore, easily adopted by other States at a considerable savings in start-up costs. It is essential that States and FNS establish viable communication channels in order to make efficient use of past experience and to avoid repeating mistakes.

Workshop Objective

The primary objective of the workshop was to discuss the intricate steps and processes involved in the implementation and management of an automated system. The issues discussed fell in the areas of the development, maintenance, and future modification phases of State ADP systems.

Some of the problems discussed were experienced by more than one State. Such problems included: proper allocation of staff; availability of required staff (data processing and systems personnel); proper bidding procedures; understanding contracts; accountability and responsibilities of FNS and State personnel in all phases of automated systems; the proper method for advance planning of systems; and, modifications and future changes in a system.

Recommendations From Workshop

● Additional ADP Meetings - Workshop attendees agreed that the National Meeting was helpful in establishing a foundation for increased communication among State agency personnel and with FNS staff. The sharing of information on existing ADP systems reduces the problems encountered by State staff as they attempt to start-up or revise a system to meet their specific needs. Consequently, the recommendation was made that FNS sponsor another national meeting specifically for ADP personnel. And, if possible, that FNS sponsor additional meetings of State ADP personnel using systems in common, such as the National Model.

● Profile of ADP Systems - A profile of each of the ADP systems currently in use in State agencies would be a very useful tool in determining the systems available and the features available within each system. The profiles would be very useful to State personnel in determining which ADP system would best meet their needs or in deciding whether to make revisions to a system already in service. Once established, the profiles should be updated to ensure that the information is current. The National Model was of particular interest to workshop attendees who would like to see profiles of that system as it exists in each State. Some workshop attendees believed that the National Model requires extensive modification when it is implemented and that such modifications are of interest to every State agency currently using the system or considering its use in the future.

● National Clearinghouse - FNS should establish and maintain a clearinghouse of information on the continuous revisions and enhancements that are made in State ADP systems nationwide. This information would be extremely useful to other States which need to update or start-up a system. ADP methods of monitoring vendors are of particular interest at this time. State agencies are very interested in learning what other State ADP systems have achieved to date in the area of vendor monitoring and are equally interested in forthcoming achievements and improvements. Such sharing of information would be possible if FNS organized and maintained a current information bank to which all State agencies could contribute.

● Public Comment on ADP System - State agencies should consult vendors, participants and other individuals or groups affected by the ADP system selected. In the past, for example, State agencies failing to clear vouchers with vendors and participants have encountered unexpected problems with the acceptability of those vouchers. Redesigning vouchers and other problems are easily avoided if the ADP personnel consult interested parties about the system under consideration.

● Reconciliation of Vouchers - Some workshop attendees recommended that the requirement for one-to-one reconciliation of vouchers be reduced to less than 100 percent of the vouchers. Those attendees believed that a properly selected sample of vouchers would reveal any problems or potential problems in the food delivery system.

USDA Commitment

FNS agreed to develop profiles of ADP systems in use in every State. Work is currently underway on that commitment. It is anticipated that the profiles will include information such as: a description of each system, including modifications; a description of the overall method of operation; reports generated by the system; information on the data base, if one is in use; edits and checks incorporated into the system; nutrition surveillance information provided by the system to the Center for Disease Control; costs of operation per participant; and, a list of persons in each State to contact for further information on each system.

STATE ADP SYSTEMS
IN USE AS OF NOVEMBER 1979

Mid-Atlantic Region

Delaware - Bradford
Pennsylvania - National Model
Maryland - Bradford
New Jersey - Electronic Data Systems
Puerto Rico - In-House System
New York - Electronic Data Systems
West Virginia - National Model
Virginia - National Model

Mid-West Region

Illinois - National Model
Indiana - Bradford
Michigan - National Model
Minnesota - Bradford
Ohio - National Model
Wisconsin - Bradford

Mountain Plains Region

Colorado - Interaction
Iowa - In-House System - (now adopting Oregon's system)
Kansas - Professional Data System (PDS)
Missouri - National Model
South Dakota - National Model
Utah - Interaction

New England Region

Connecticut - National Model
Massachusetts - Bradford
Rhode Island - National Model
Vermont - In-House System

Southeast Region

Alabama - National Model
Florida - In-House System
Georgia - Bradford
North Carolina - National Model
South Carolina - In-House (utilizes 2 systems)
Tennessee - In-House System and UNICOMP

Southwest Region

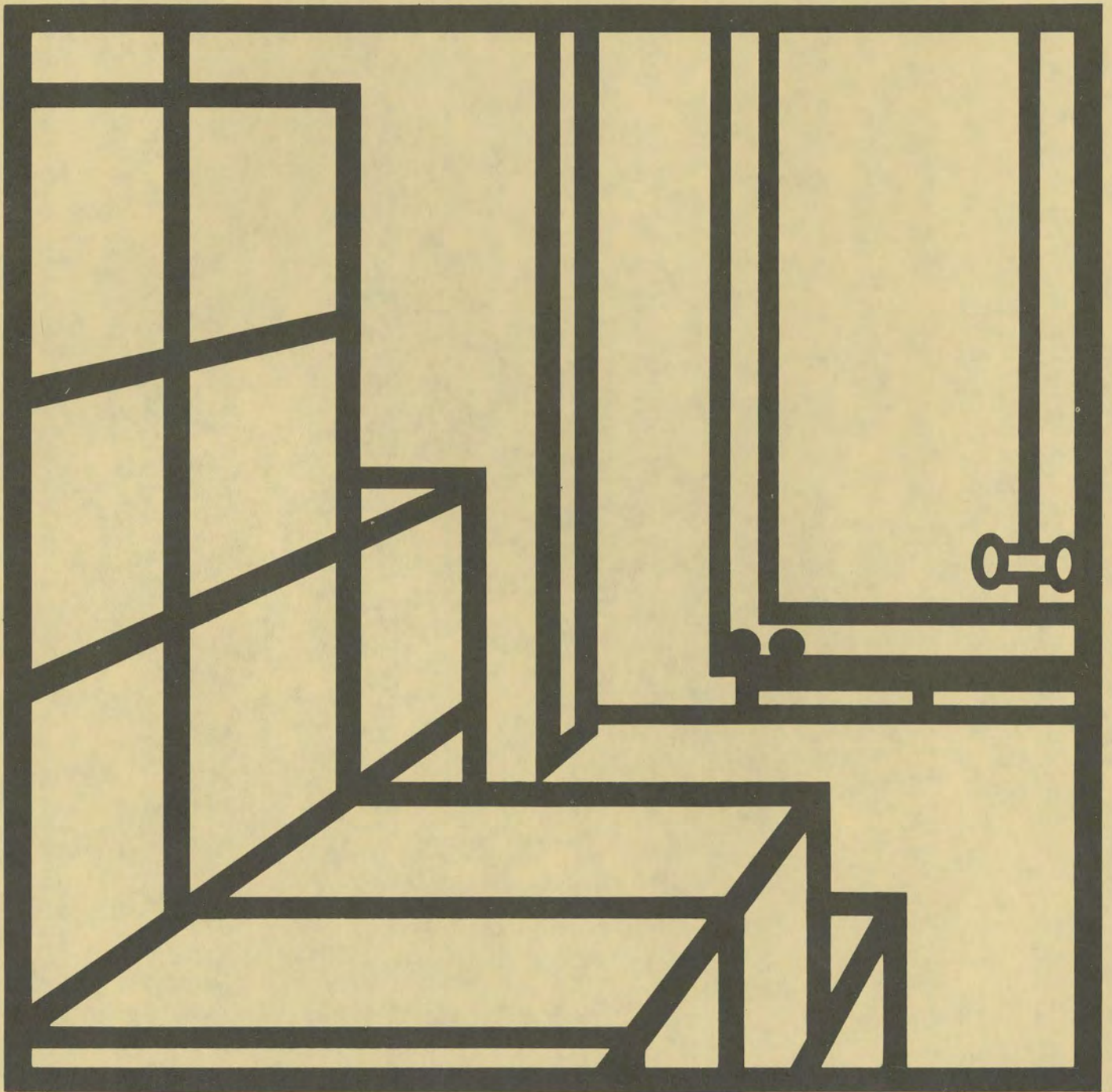
Arkansas - In-House System
Louisiana - In-House System
New Mexico - American Data System
Oklahoma - National Model
Texas - National Model

Western Region

Idaho - National Model
Oregon - National Model
Washington - Interaction

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WAREHOUSING



WATERBORNE

WAREHOUSING

All CSFP administrators must be well versed on warehousing techniques to ensure the proper storage of commodities prior to distribution. Although the majority of WIC Program foods are distributed through the retail purchase system, some WIC State or local agencies use the direct distribution system which is very effective and economical and requires a knowledge of proper warehousing techniques. The workshop on warehousing was conducted to give interested individuals an opportunity to share innovative ideas and accomplishments developed in the mechanics of warehousing.

In many instances, food losses from deterioration and infestation are the result of inadequate storage facilities, undesirable handling practices, and other conditions that can be corrected by following the preventive and control measures outlined in this chapter. Careful consideration must be given to providing needed storage facilities to ensure that all foods will maintain their high quality and nutritive value until consumed. Temperature, humidity, ventilation, rodents, and insects must be controlled throughout the storage period.

MANAGEMENT PRACTICES

● Inspection of Foods Upon Arrival. Each delivery of food should be carefully checked for possible shortages and damage before the foods are accepted. Thoroughly inspect all foods before they are put in storage. Canned foods should be examined to determine if there are any damaged, disfigured, or discolored cases or cans, which might indicate spoilage or deterioration. Foods subject to insect infestation need to be thoroughly inspected. Even though foods are free of infestation when shipped, they may arrive badly infested due to the use of an infested freight car or truck. Any foods that are found to be out of condition at time of receipt must be segregated from other foods. Foods found to be out of condition are to be recorded and reported to the State distributing agency.

● Recordkeeping. It is essential to keep accurate records on the amounts of food in stock and the quantities of food moving into and out of storage over given periods of time. To keep satisfactory food controls, it is important to establish a system with one person designated to keep the records. Methods used to maintain this information will vary with the individual warehouse. The person designated to keep the inventory will find it best to set aside a specific time for posting the daily entries.

RECOMMENDED STORAGE PRACTICES

The importance of storing food properly cannot be overemphasized. Improper storage may cause spoilage which is not only wasteful but increases food costs. Of even greater importance is the health hazard involved. Food that is even slightly tainted may cause illness.

In storing foods, it is important not only to consider the use of proper storage methods to reduce food spoilage, but also to consider efficient methods of storage which will save space and make it easy to handle the foods. The following storage practices are recommended:

- Date or Number the Foods. Date or number the new stock with easily legible print for easy identification and to provide a record so that the old stocks may be used first.
- Place Oldest Out Front. Placing oldest stocks out front will assure the use of the foods on a "first-in, first-out" basis.
- Store Foods Off Walls and Floors. All foods should be stored away from the walls and off the floor. This keeps them from absorbing moisture that will cause cans to rust, package seams to burst, and foods to mold or rot.
- Stack Bagged Foods on Dollies or Skids. Quantity lots of bagged foods may be stacked on dollies or skids to permit the necessary circulation of air. To make the most effective use of the storage area, stack the foods as high as safely practicable for ease in handling.
- Stack Boxed Foods on Dollies or Skids. Quantity lots of cased and boxed foods, stacked in alternating patterns on dollies or skids make a stable load for storing and handling. Smaller lots of canned foods may be stored on shelves in or out of the case.
- Stack Foods of a Kind Together. Arrange the foods in the storage space according to type to facilitate taking inventories.
- Store Foods According to Odor. Foods that absorb odors must be stored away from foods that give off odors. Do not store items such as paint, kerosene, gasoline, oils, naphthalene, soap, wax, polishes, mops, or wearing apparel in the same area with foods. Provide a separate storage room for such items.

HOUSEKEEPING PRACTICES

Good housekeeping practices should be followed daily to insure cleanliness and orderliness in all food storage areas. Sanitation and cleanliness are a must in food handling and storage. To keep the dry food storage area in good condition, foods must be inspected regularly and cleaning schedules established and followed.

Check all food frequently for evidence of spoilage, such as bulging and leaking cans. Where spoilage has occurred, remove the food immediately and clean the area thoroughly to prevent contamination of other foods. Inspect also for such damage as torn sacks and broken cartons. If the food is in good condition, use it immediately or repackage it and use it as soon as possible. All empty containers and sacks should be removed from the storeroom.

The storeroom floors should be swept daily and mopped at least once a week. For sweeping floors, nonpungent sweeping compounds are recommended. If these are not available, the floor should be lightly sprinkled with water before sweeping. Skids or dollies on which foods are stored should be removed as needed to permit thorough cleaning of the floors. The walls, shelves, skids, and dollies should also be cleaned and washed regularly. Any foods dropped or spilled on the floor should be cleaned up immediately to prevent rodent and insect infestation.

● Insect Control. Insects destroy or render unfit for human consumption enormous quantities of food each year. The following foods are susceptible to insect infestation: dried beans and peas; grain products (flour, cornmeal, rice, cereals, etc.); dried fruits (prunes, raisins, apricots, etc.); nonfat dry milk; and cheese. Nuts are also very susceptible to insect infestation. If any program foods are stored in space which also houses nuts, caution should be exercised to prevent the possible spread of insects into the program foods.

There are many ways in which insect infestation may occur in a storeroom. Insects or insect eggs may be harbored in floor cracks, baseboards, or in storeroom walls, in freight cars and trucks in which foods are transported, or in shipping containers, especially where the containers are re-used without proper cleaning or fumigation. Insect infestation is evidenced by the presence of webbing, beetles, moths, larvae, holes in grain, or partly-consumed foods. The insects themselves often can be seen on the outside of containers, especially on the bottom or sides of containers that are stacked against or on top of other containers. Since insects cannot always be found on the outside of containers, it is also necessary to inspect the inside of bags and cases. In bagged foods, insects are usually found in the creases of the bags, along seams, or in the ears of the bags. In cased foods, they may be found in the dark, closed sections of the boxes. It may be necessary to examine several bags or cases of foods before any infestation is noticed.

Insect infestation may occur even under ideal storeroom conditions; therefore, constant vigilance must be maintained for any sign of infestation, particularly during warm weather. Insect infestation of foods such as cornmeal, flour, beans, rice, dried fruits, and nonfat dry milk can be prevented by keeping these foods stored at temperatures below 50 degrees.

● Rodent Control. Rodents also destroy or render unfit for human consumption enormous quantities of food each year. They are carriers and transmitters of such diseases as typhoid fever, cholera, tuberculosis, bubonic plague, and rabies. Rodents enter buildings through holes or openings around pipes and wires, and they frequently burrow under floors and enter through ventilation and drainpipes. Therefore, all such openings need to be covered or sealed with $\frac{1}{4}$ -inch-mesh galvanized hardware cloth or sheet metal. All fan and ventilation openings, doors, and windows require screens. A rodent can enter a hole as small as the circumference of a government pen. Since rodents often enter warehouses through gaps under doors, it is extremely important to have tight fitting doors.

The most important way to control both rodents and insects is to maintain a clean warehouse which is also impenetrable and prevents their entrance. It is necessary to eliminate trash that could attract rodents and insects. The most effective ways of eliminating both rodents and insects are by extermination and fumigation. Both of these services can be rendered by a reputable licensed company. However, the services of such a company should not be relied upon completely. It is also important to have an organized program of good housekeeping with a designated responsible employee in charge.

Any contracts made with fumigating companies should contain a statement to the effect that the contractor will comply with all Federal, State, and local laws and regulations and that proper aeration of the building will be accomplished after fumigation. The improper use of some fumigants may result in an explosion or a fire, or in ill effects to employees from exposure to the chemicals used. Therefore, a fumigating company must show evidence of public liability, property and fire insurance, and workmen's compensation. Since it is possible that the first fumigation will not effect a complete kill and may have to be followed with a second fumigation, a 100-percent-kill guarantee should be included in any contract entered into with a fumigating company. Poisons are dangerous to use around food items and must be used only by experienced and trained exterminators or under their supervision.

Warehouse and Equipment

To efficiently handle incoming foods, the warehouse should have both a loading platform and a receiving area. A loading platform facilitates handling of foods and protects them from the elements during the course of unloading. A receiving area inside the building is also needed to provide temporary storage until deliveries are checked for quality, weight, and count.

● Loading Platform. The space needed for the loading platform will vary depending on the delivery service and the volume of deliveries. The platform should be at least 6 feet wide from front to back and at truckbed height. For smaller operations where deliveries are

made by panel trucks a lower height may be more desirable. The floor of the loading platform should be slip-resistant concrete with integral hardener. The edge should be reinforced with heavy steel angle iron; a wood or rubber bumper is optional. The floor should be at the same level as the entrance to the inside receiving area. It is important to consult State and local authorities having jurisdiction over applicable regulations. A roof offering weather protection should extend over the entire platform. The roof must be high enough to clear any delivery truck (generally 13 feet). Steps with a handrail should run from the platform to the driveway level. As a minimum, a 150 to 200 watt lighting unit should be provided. The lighting and wiring should comply with National Electrical Code requirements (an American standard) and local electrical code requirements for the loading platform. A hot and cold water hose should be available for cleaning. A floor drain in the docks will help in scrubbing down.

● Receiving Area. The receiving area inside the building should be adjacent to the outside loading platform and, if possible, separate from the storeroom. The space needed for the receiving area will vary depending on factors such as the delivery service used and the volume of foods stored. The walls and ceiling of the receiving area should be light in color, smooth, impervious to moisture, and easy to wash and keep in good repair. Glazed tile is the most desirable finish; however, painted plaster or masonry is acceptable. Plasterboard or wood is not desirable because neither is vermin-proof. Coved bases are needed at the floor line, and local regulations may require coved vertical corners as well. Metal corner guards, preferably stainless steel, should be installed on all projecting corners subject to traffic damage. It is important to have heavy-duty doors between the outside loading platform and the receiving area inside the building. As a minimum, the clear opening between these areas should be 3 feet 4 inches wide. The door must be self-closing with locking devices. A kick plate from 8 to 12 inches high is needed on both sides of the door. The need for windows in the receiving area can be determined from State and local regulations. If windows are provided, they should not interfere with equipment. Be sure to check local regulations regarding fly and pest control; i.e., screened doors, blowdown fans, etc. Lighting needs for the receiving area can normally be met by 2 to 3 watts per square foot of floor area.

● Dry Food Storage Area. The dry food storage area provides orderly storage for food not requiring refrigeration. It should also protect foods from the elements, fire, insects, rodents, organisms and other causes of spoilage, and from theft. Floors should be level with surrounding areas for food preparation and receiving to allow for the use of mobile equipment in the movement of supplies. Floors

should be slip resistant, preferably of terrazzo, quarry tile, or concrete with integral hardener. Check local regulations regarding floor drains. Walls and ceilings should meet the specifications described above for the receiving area. A heavy-duty door is needed, at least 36 or 40 inches wide. The door should lock from the outside, but should always open from the inside without a key. Windows are unnecessary unless required by State and local regulations. If windows are provided, they should be equipped with security-type sash and screens, painted opaque to protect foods from direct sunlight, and placed to avoid interference with shelving. Good lighting in the storage area makes it easier for employees to locate foods, eases the job of accurately checking paperwork associated with recordkeeping, and contributes to better housekeeping by employees. When the light is fairly uniform throughout the storeroom, it is easier to see areas that require cleaning. Experience shows that employees will keep working areas cleaner and neater under these conditions. Lighting and wiring must comply with National Electrical Code requirements (an American standard) and with any other local requirements. In order to provide adequate lighting for the storage area, illumination levels of approximately 15 foot-candles are desirable. This is normally achieved by about 2 to 3 watts per square foot of floor area. For best distribution of light, have the fixtures centered over each aisle.

● Ventilating Systems. Good ventilation in the dry food storage area is essential to proper storage of any type of food. By helping to control the temperature and lower the humidity, ventilation retards growth of various types of bacteria and molds, prevents mustiness and rusting of metal containers, and minimizes caking of ground or powdered foods.

Temperatures of 50 to 70 degrees are recommended for the dry food storage area. During some months, it may be possible to maintain temperatures between 40 to 45 degrees, and this is desirable for foods normally kept in the dry food storage area. In cooler climates, the recommended temperatures can usually be held by proper insulation and by natural and/or mechanical ventilation. Proper construction of the storeroom will provide natural ventilation by permitting entrance of fresh cool air through louvers at the floor level and the escape of warm air through louvers at the ceiling or roof level.

Mechanical or forced-air ventilation, with intake and/or exhaust fans, keeps fresh air circulating. An oscillating fan may be of some help. Generally four air changes per hour will be adequate. During the winter months, it may be necessary to use heating equipment to keep certain foods from freezing.

In hot, humid climates where the recommended temperatures and humidity levels cannot be maintained by natural or mechanical ventilation, it may be necessary to install artificial refrigeration to keep the temperature from going over 70 degrees. Where artificial refrigeration cannot be provided, a dehumidifier will be of some help.

The storeroom should be free of uninsulated steam and hot water pipes, water heaters, refrigeration condensing units, or other heat-producing devices.

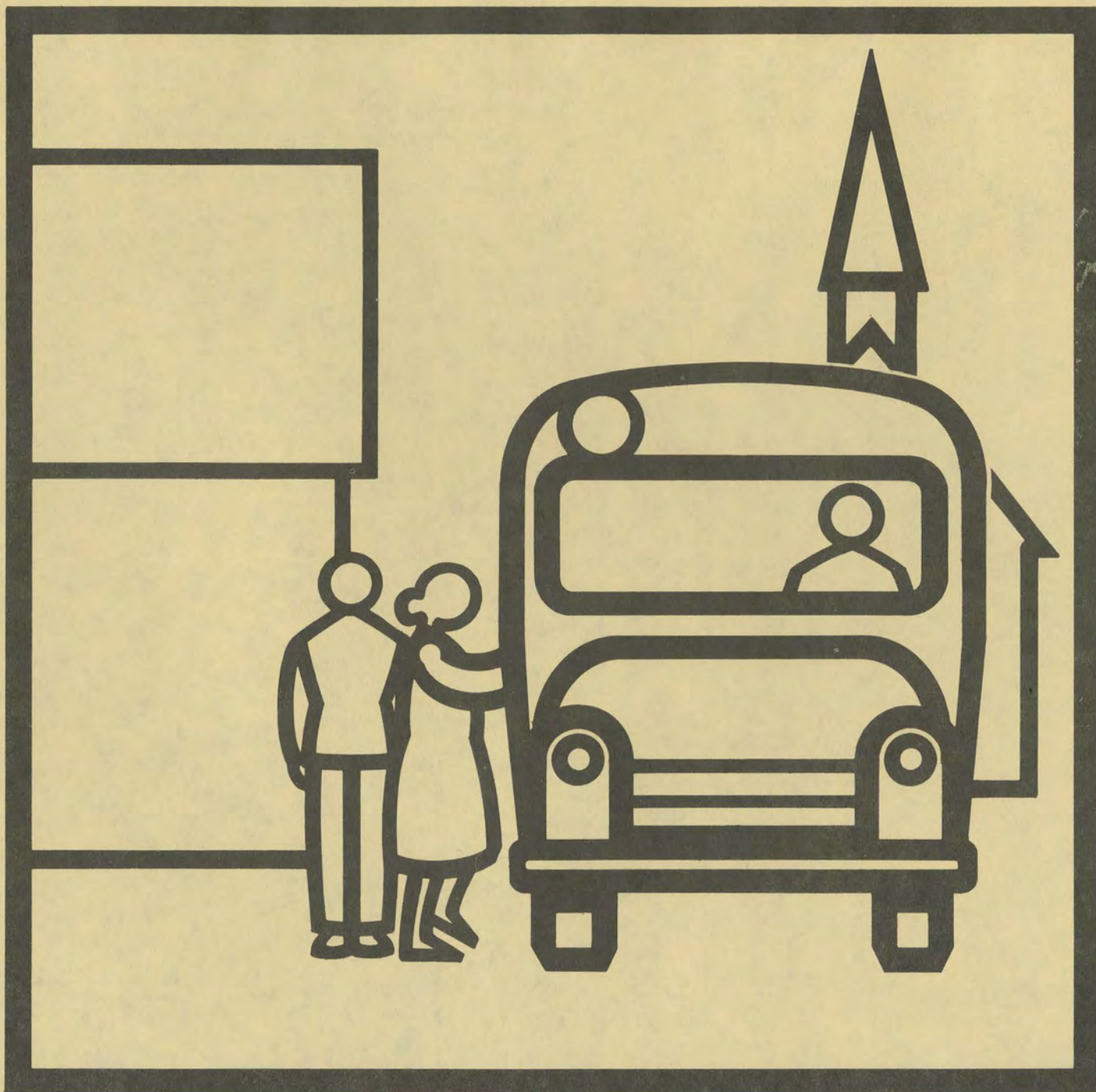
● Thermometers. Wherever foods are stored, a reliable thermometer is essential to make sure that proper temperatures are maintained to prevent spoilage and deterioration. Mount the thermometer near the door, where there is less danger of breakage from bumping, and at about eye level for easy reading. It should not be mounted on the door, near a light bulb, or in a recessed area. Take thermometer readings at least once a day, and more frequently if there is difficulty in maintaining the desired temperatures. When necessary, corrective measures should be taken to lower or raise temperatures.

● Shelving. Metal shelving is recommended. Upright supports should not be more than 48 inches apart. The maximum practical height is 6 feet. Allow vertical adjustments of 1 inch for shelf supports so that shelving can be adjusted to accommodate various foods. The shelving should be well braced against tipping. Allow a minimum of 1 to 2 inches clearance from all walls for cleaning and air circulation. The bottom shelf may be 24 to 30 inches deep; other shelves 18 to 20 inches deep. Standard shelving is available in various widths. Vertical clearance between the bottom shelf and the floor should be high enough to permit storing foods in covered metal containers on dollies, and sacked and cased foods on portable platforms.

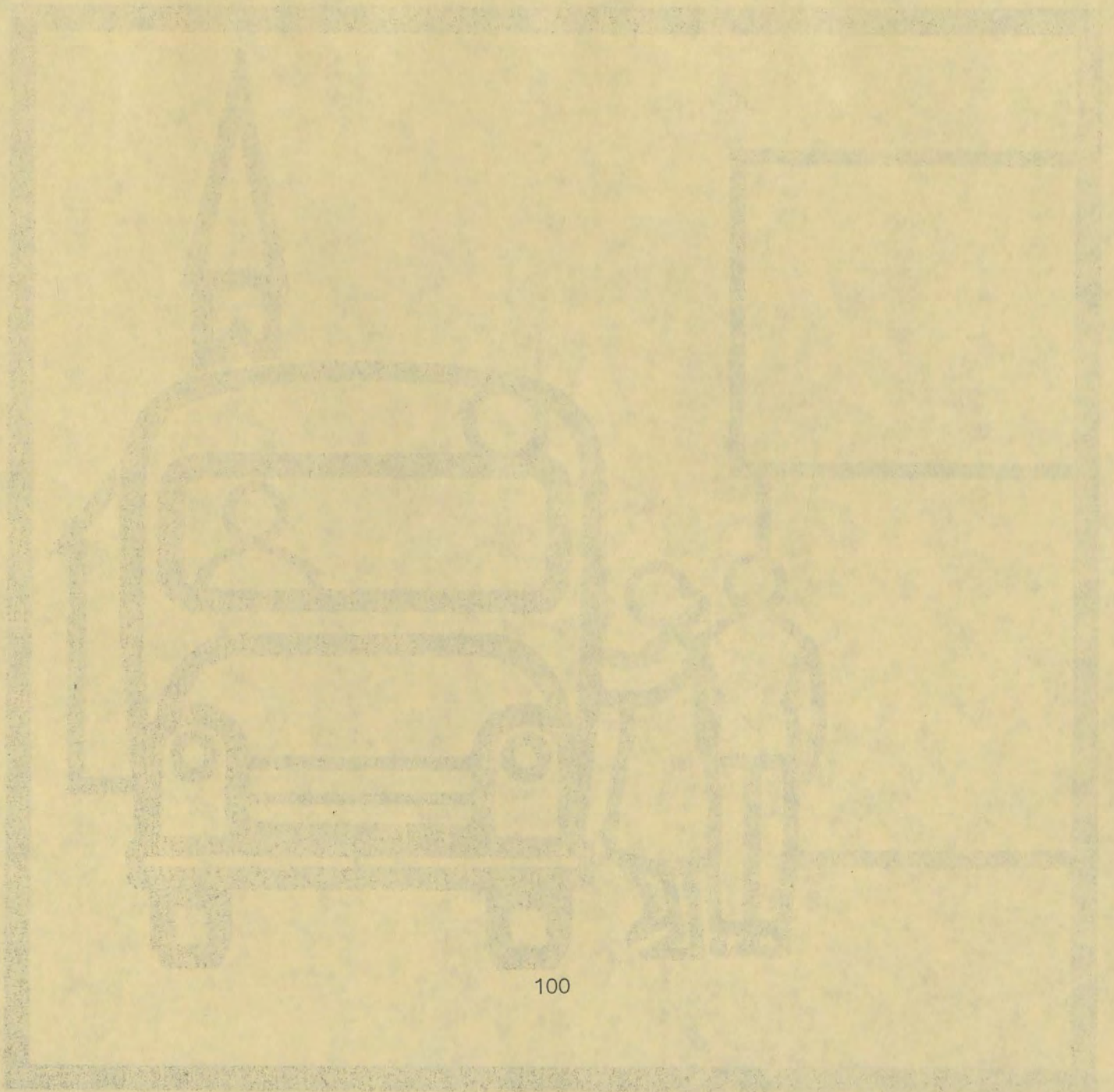
● Aisle Space. Aisles which only provide access to shelving should be at least 30 inches wide. Aisles for movement of trucks, skids, dollies, and portable platforms should be 42 inches wide as a minimum.

● Storeroom Equipment. Portable equipment is needed for efficient handling and storing of foods. The volume and kinds of foods to be handled determine the types of equipment. In addition to the two-wheel and four-wheel handtrucks, it is desirable to provide shelf-type trucks, skids, and dollies. Metal or plastic containers with tight fitting covers should be used for storing broken lots of items such as dried beans. Power or hand operated fire extinguishers should be available and inspected regularly to determine if they are in usable condition. Handwashing facilities are essential for all personnel.

COMMUNITY RESOURCES



COMMUNITY RESOURCES



INVOLVEMENT OF COMMUNITY RESOURCES

State and local agencies administering the CSFP or the WIC Program should enlist the assistance of community organizations and of volunteers for two important reasons.

- Redistribution of Work - Volunteers can absorb a portion of the workload normally handled by professional staff members. Such assistance enables the staff members to spend more time increasing service to participants and improving overall program operations.
- Public Relations - Community support can be crucial to the success of a program. The use of volunteers involves increased contact with community organizations and results in increased community awareness of the program and its benefits to participants. Community awareness strengthens the political support for the programs and also serves as an informal means of outreach.

The Use of Volunteers

There are a number of areas in which volunteers can be of substantial assistance to local agencies, if imagination and initiative are used to enlist their aid. Volunteers can perform many of the time consuming jobs which do not require technical expertise, but which do require a willingness to serve others for the betterment of the community.

- Transportation - Transportation of participants to and from the local agency is one of the most necessary and most satisfactory use of volunteers. The necessity is created by the fact that many participants in rural areas have no means of transportation and many participants in urban areas cannot afford the available transportation. The satisfaction is created by the fact that the need for the service and the benefit to the participant are immediately evident to both the volunteer and the participant.
- Nutrition Education - Volunteers can teach the less technical areas of nutrition education such as the supplemental nature of the program, the use of recipes utilizing supplemental foods, and the importance of participants rather than other family members consuming the prescribed foods. Nutrition education activities would have to be done under the supervision of professional personnel, but, the opportunities for the use of volunteers should not be overlooked. Students in nutrition or related courses may be willing to donate time to teach more advanced subjects. Accounting for the time and money spent on nutrition education could be done by volunteers under the supervision of the local agency's financial management officer. Additionally, CSFP and WIC Program regulations require that the annual evaluation of nutrition education include an assessment of participants' views concerning the effectiveness of nutrition education received. Volunteers from the community would be ideal to collect this kind of information since it requires the accurate understanding and recording of the participants' views more than it requires technical expertise.

● Certification - Volunteers could spend time with the applicant to explain the purpose of the program. Volunteers could perform some of the routine responsibilities concerning informing participants of their right to a fair hearing, explaining the requirements for eligibility and the mechanics of participation, and answering applicants' questions. On a more technical level, students at nursing or other schools, if allowed by the State, could be enlisted to perform blood tests, take dietary histories, or write up the results of nutritional examinations performed by the nurse or nutritionist. States which are experiencing difficulty in meeting the 10 and 20-day WIC Program certification processing standards could enlist volunteers to keep files of requests for appointments, and to budget the professionals' time to ensure that all applicants can be seen. Volunteers could also be helpful in managing the local agency's waiting list and in contacting persons who have applied for CSFP or WIC benefits.

● Food Delivery - Volunteers could perform many of the tasks related to food delivery. For example: many of the clerical tasks involved in accounting for food or food instruments; issuing food at direct distribution sites; checking prices at local retail stores; and filing vendor agreements or other documents.

● Translations - Bilingual volunteers can be especially useful in interpreting for non-English speaking applicants and participants in local agencies where the staff is not able to speak the appropriate language. Volunteer translators can be used to provide all of the above-mentioned services and are particularly useful in outreach efforts.

● Outreach - Volunteers can be used in outreach activities to expand caseloads when funds are available, or to target benefits to the high risk categories when an agency is at maximum caseload. Celebrities are often willing to make public service announcements or do fund raisers. Organizations can also be asked to raise money. Businesses may donate expertise and/or equipment. For example, an advertising agency in Detroit designed a poster for Focus:HOPE; New York's Bell Telephone Company donated sound equipment for neighborhood outreach campaigns and mailed school breakfast information along with monthly bills; the Detroit Free Press donated TV equipment to Focus:HOPE; the Detroit Gas Company prints menu books for CSFP participants; telephone installers for the Michigan Bell Telephone Company distributed pamphlets on CSFP to all low-income homes they visited.

● Other Tasks For Volunteers - As stated previously, a professional staff can improve any program by enlisting the support of volunteers from the community. Some additional services volunteers can provide are listed below:

- Provide child care while participants complete certification requirements.
- Telephone participants who fail to keep appointments.

- Write newsletters.
- Decorate or repair offices and clinics.
- Make presentations to the community about the program and its benefits.
- Collect data for State or local agency studies.
- Talk with participants about topics of interest such as breastfeeding or home gardening.

Locating Volunteers

Before soliciting the help of volunteers it is important to know why you want the volunteers, exactly what you want the volunteers to do, and when you want the work done. Recruitment is much more effective when the potential volunteers know that they can meet your specific needs. In most communities there are numerous people who have time to spend and would like to perform some useful service, if they only know where they could be of help.

● Medical Sources - Hospitals, many of which rely on volunteers to perform personal services for which nurses and other employees do not have the time, often maintain lists of available volunteers. Medical Associations for physicians and nurses may be sources of professional volunteers.

● Universities and High Schools - Both secondary and college level students may be willing to devote their time to doing research, giving classes, or simply being involved in the program. Many students would be happy to spend time in return for experience in office management, business administration or research. For example, in the recent migrant demonstration project, Colorado used a traveling team of interns and other students to provide WIC and health services to areas lacking an established clinic. The students did much of the necessary work, under the supervision of a nurse or a doctor. Colorado State has been active in providing students to perform special projects or develop materials for the local program. This source of volunteer work is especially attractive for local programs located in college towns.

● Community Organizations - Most towns and cities have youth, church or social groups which are often active in charitable activities. Examples of these types of groups include the Jaycees, Knights of Columbus, or the Lions Club. Also, local businesses may also donate materials or financial resources to assist the Program.

● VISTA Volunteers - An obvious source of volunteer assistance is the Volunteers In Service to America (VISTA). Programs using VISTA volunteers can be developed at the local level. Those programs are submitted to the State VISTA office, which approves new programs based on VISTA's guidelines. State and local agencies should contact local VISTA organizations to see what kinds of projects would be available.

● Public Announcements - News media announcements and notices posted in appropriate locations are excellent means of recruiting volunteers. News media announcements may include radio, television, journal articles, and advertisements. Notices may include posters and literature displayed and/or available at locations such as welfare departments, grocery stores and private physicians' offices.

● Professionals - Individuals in many professions can provide extremely valuable services. Legal services' offices, food dealers' associations, civic affairs departments of corporations and other such sources can produce skilled volunteers. For example, in Detroit, 375 doctors write prescriptions for CSFP, court reporters refer people to the program, a local printer donates the CSFP certification forms, and a TV newsman helps with the production of Focus:HOPE's video shows.

Workshop Recommendation

It was suggested that FNS collect, compile, and distribute information on the various types of community resources being utilized by CSFP and WIC Programs.

CONCLUSION

We at FNS believe that our first National Meeting for Supplemental Food Program Directors was very successful. The meeting provided the location and the format for an excellent exchange of information and innovative ideas between individuals from different States and regions. We feel that all who attended the meeting returned to their communities with fresh ideas to solve, or at least minimize, old problems. More importantly, we hope all in attendance received reinforcement to achieve our difficult goal of ensuring that our nation's children escape nutritional deficiencies and the accompanying mental and physical ill effects, which prevent them from leading enjoyable and productive lives.

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