



April 18, 2019

The Honorable Sonny Perdue
Secretary of Agriculture
United States Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Dear Secretary Perdue:

The U.S. Department of Agriculture (USDA) has consistently sought to fulfill the motto “do right and feed everyone.” That mission could not be realized without the efforts of the Food and Nutrition Service (FNS). For decades, FNS has administered federal nutrition programs, including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). WIC and other vital child nutrition programs connect America’s agriculture sector with the core humanitarian service of delivering quality nutrition support to low-income infants and children.

The National WIC Association (NWA) is the advocacy voice for WIC service providers, including staff at the over 10,000 WIC clinic sites across the country, and the roughly 6.9 million mother and young children who participate in WIC. NWA works in tandem with USDA and State Agency staff to efficiently administer WIC and maintain a high standard of customer service. NWA appreciates USDA’s engagement with the WIC community, including most recently a roundtable and listening session jointly hosted by Acting Deputy Undersecretary Brandon Lipps and NWA at our Washington Leadership Conference last March.

In this spirit of collaboration, NWA writes to express our significant concern with recent FNS actions to realign certain State Agencies within the FNS Regional Office system starting in the 2020 fiscal year. The sudden announcement of this decision – offered with little to no justification, and without consultation with either State WIC Program Directors or NWA – does not take into account serious implications to WIC program administration, including crucial funding and operational issues. The clear consequences of the FNS Regional Office realignment result in the dissolution of long-standing collaborative partnerships and professional relationships that have led to multi-state projects and initiatives of national significance.

Beth Beachy
Illinois
Chair

Berry Kelly
South Carolina
Chair-Elect

Rita Arni
Missouri
Chair Emeritus

Barbara Riley
Ohio
Secretary

Melinda Morris
Colorado
Treasurer

Rev. Douglas A. Greenaway
Washington, DC
President & CEO

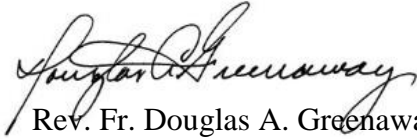
Beyond the personal and professional impacts, it appears that FNS did not sufficiently contemplate the disruption to WIC program administration in the following respects:

- **Regional Operational Adjustment Funding:** FNS Regional Offices administer WIC's Operational Adjustment (OA) funding for their region, which reallocates a percentage of each State Agency's grant to assist the agencies in greatest need of funding. OA funding is pivotal in maintaining program operations in low-capacity agencies, including rural states and Indian Tribal Organization State Agencies (ITO-SAs). The realignment of State Agencies in Utah and Iowa outside of the Mountain Plains Region will have a significant consequential impact on the stability of WIC funding in that region, which already has disproportionately fewer resources than other regions.
- **Regional MIS/EBT Multi-State Agency Projects:** Over the past nine years, FNS Regional Offices provided significant technical assistance as State Agencies transitioned to electronic-benefit transfer payment systems (EBT) and, in some cases, new management-information systems (MIS). Low-capacity State Agencies – especially territories and ITO-SAs – have relied on larger states in their region to host and coordinate MIS and EBT systems. The realignment will now require three multi-state agency projects (the HANDS Consortium led by Arizona, the Mountain Plains MIS User Group led by Utah, and the Maryland-US Virgin Islands partnership) to straddle multiple FNS Regional Offices, reducing efficiency by mandating duplicative oversight.
- **State Procurement Alliances:** Similarly, State Agencies have combined their purchasing power to streamline procurement processes. State alliances reduce administrative burden and promote efficient management of resources. With the realignment of the State Agency in the US Virgin Islands, the largest state alliance – NASPO – will now require approval in five FNS Regional Offices. This is anything but streamlining.
- **Consultation with Tribal Governments:** The federal government has long recognized the unique relationship between federal agencies and Indian tribes, but FNS did not address proposed realignment in tribal consultations. At least two ITO-SAs – Navajo Nation and the Inter-Tribal Council of Arizona – are being realigned into a new region, but several other ITO-SAs are affected by the reduction in regional funding resources. There are ten ITO-SAs in the Mountain Plains Region that will be significantly harmed by the loss of regional support, and the broken bonds of professional mentoring relationships.

USDA has pledged to ensure that programs are delivered efficiently and effectively, with a strong emphasis on customer service. As proposed, the FNS Regional Office realignment would disrupt current program operations, destabilize funding sources for rural and low-capacity State Agencies, impose new bureaucratic hurdles on technology vendors, and undermines USDA's customer service responsibilities to its State WIC stakeholders. These consequences create inefficiencies for no apparent justifiable reason. In administering programs that are vital to the growth and development of America's next generation, we urge USDA to live up to its motto and do right when feeding everyone.

NWA urges that FNS delay implementation of any FNS Regional Office realignment until these concerns are remedied. If it would be helpful, we are happy to meet with you to present these concerns in person. Please feel free to reach out to me at douglasg@nwica.org or Brian Dittmeier, Senior Public Policy Counsel, at bdittmeier@nwica.org should you have any questions or to identify an agreeable time.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas A. Greenaway". The signature is fluid and cursive, with the first name being the most prominent.

Rev. Fr. Douglas A. Greenaway
President & CEO
National WIC Association

cc: Brandon Lipps, Acting Deputy Undersecretary for Food, Nutrition, and Consumer
Services, USDA
FNS Regional Administrators
NWA Board of Directors