USDA Food and Nutrition Service (FNA)
2024 and 2025 Estimates of WIC Eligibility and Program Reach
PERFORMANCE WORK STATEMENT

1. Introduction and Purpose

The Food and Nutrition Administration (FNA) of the United States Department of Agriculture (USDA) seeks a single qualified contractor to produce accurate, reliable, and timely national, regional, and State agency (including territory-level) estimates of eligibility and program reach for calendar years (CY) 2024 and 2025 for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). These estimates will include eligibility counts, eligibility rates, coverage rates, and participation rates. The contractor shall compile these estimates into a public-facing report, as described below, which will be the latest in a long-running series.[1] For the first time, the contractor shall also develop a methodology and generate county- and Congressional district level eligibility, coverage, and participation estimates for FNA internal use for 2024 and 2025.

2. Background

WIC is administered by 88 State agencies, including the 50 States, 32 Indian Tribal Organizations, the District of Columbia, and 5 U.S. Territories. WIC provides supplemental foods, health care referrals, breastfeeding support, and nutrition education to nutritionally at-risk, low-income pregnant, breastfeeding, and non-breastfeeding postpartum women, infants, and children under age five. These agencies are responsible for administering the work of about 1,800 local WIC agencies that, in turn, operate about 10,000 clinic sites. WIC clinics are the point of service for program participants. In fiscal year 2025, WIC served an average of 6.9 million participants each month.

FNA monitors WIC participation at the national and State agency levels and uses these statistics to track program performance, develop participation projections, and inform Federal budgeting. However, participation counts alone do not provide a complete picture of program reach. To fully assess program performance, understand unmet need, and support effective outreach, FNA requires estimates of the number of individuals who are eligible for WIC benefits and the share of the eligible population that is reached by WIC. These statistics are of interest to others outside of FNA including State and local program administrators, policy officials, and researchers. Estimates of eligibility, participation, eligibility rates, coverage rates, and participation rates are required under this contract and are defined in Table 1 below.

Table 1. Definitions of Estimated Measures Required in this Contract

Measure	Definition
Eligibility counts	The estimated number of individuals eligible to participate in WIC in an average month in the calendar year of interest.
Participation counts	The number of individuals who enrolled in WIC and were issued their WIC food benefits in an average month in the calendar year of interest.[2]

[1] For most recent report, see: Kessler C., Bryant A., Munkacsy K., Maxson S., Ressler D., Saluja R., and Farson Gray K. (2025). *National- and State-Level Estimates of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Eligibility and WIC Program Reach in 2023*. Prepared by Westat, Contract No. GS-00F-009DA/140D0424A0040, Order No. 140D0424F1045. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service, Project Officer: Grant Lovellette. Available online at: www.fns.usda.gov/research/wic/eer/2023.

[2] Participation data come directly from information reported by State agencies to FNS through form FNS-798. WIC PC data is used to further disaggregate the share of participants by the age of children and other demographic characteristics not available in the FNS-798 data. For more information on the FNS-798 report see: https://www.fns.usda.gov/wic/certification-and-monthly-food-benefits-issuance-cycles-and-reporting-monthly-participation-fns-798. The participation count also includes the breastfed infants of WIC participating breastfeeding women even though the breastfeed infants are not issued WIC food benefits.

Eligibility rate	The percentage of the total population in each WIC participant category estimated to be eligible for WIC in an average month of the calendar year of interest.
Coverage rate	The percentage of the total estimated eligible population in each WIC participant category that is issued WIC food benefits in an average month in the calendar year of interest. Coverage rates are useful for understanding how fully WIC reaches individuals who are eligible for the program. Coverage rate is sometimes referred to under the umbrella term "program reach."
Participation rate	The percentage of the general population in each WIC participant category – regardless of eligibility – that is issued WIC Food benefits in an average month in the calendar year of interest. For example, one of the most frequently cited estimates from the report series is that, in an average month in 2023, 41 percent of all infants in the U.S. participated (i.e., enrolled and issued food benefits) in WIC. Participation rate is sometimes referred to under the umbrella term "program reach."

History of the Methodological Approach

In the early 2000s, the Committee on National Statistics of the National Research Council (CNSTAT), under contract to FNA, examined possible approaches to estimating the size of the national population eligible for WIC benefits. CNSTAT developed two methodologies, one based primarily on the Current Population Survey of the Bureau of the Census (CPS), and the other based on the Census's Survey of Income and Program Participation. The result of CNSTAT's work was published in 2003 (National Research Council).[3] FNA adopted CNSTAT's CPS-based methodology, and has published sets of estimates of the national, regional, and State WIC-eligible populations with contract support with various refinements, methodological enhancements, and changes in the underlying datasets requiring occasional re-estimation of the series.

For the 2020 WIC eligibility estimates, FNA did not commission a full report; instead, FNA contracted a complete review of the WIC estimation methodology, including a review of potential new data sources and methodologies. Together with input from a variety of independent and government experts, the contractor produced a memo that provided WIC eligibility estimates using four different estimation methodologies and that recommended a CPS-ASEC-based methodology as the preferred methodology for future estimates. This methodology was further refined with the production of the 2021, 2022, and 2023 WIC eligibility estimates.

3. Scope

Required Estimates

The contractor shall develop estimates of WIC eligibility counts, eligibility rates, coverage rates, and participation rates, as defined above in Table 1. Tasks under this contract shall produce 2024 and 2025 estimates and a full combined 2024/2025 report. A brief publication for 2024 estimates shall also be produced to provide timely 2024 estimates at least at the national level. The estimates will be based on the current methodology recommended in the 2020 recommendation memo (the recommendation memo will be provided to potential offerors upon request) with further adjustments as described in subsequent reports between 2021-2023.

Participant Categories

Although computation of the percent of U.S. children participating in WIC is reasonably straightforward, measuring program participation among the general population of pregnant women and breastfeeding and non-breastfeeding postpartum women is more challenging. Some of the factors that complicate those measurements include multiple births, infant deaths, reported and unreported miscarriages and other fetal loss, pregnancies in WIC-participating mothers with a child less than a year old, and variations in definition of breastfeeding.

[3] National Research Council. (2003). *Estimating Eligibility and Participation for the WIC Program: Final Report*. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: The National Academies Press.

The contractor shall develop the "Required Estimates" described above for each of the following populations:

- Infants
- Children
  - 1-year-old children
  - 2-year-old children
  - 3-year-old children
  - 4-year-old children
- Pregnant women
- Postpartum women
  - Breastfeeding women
  - Non-breastfeeding women
- Total WIC-Eligible Population

Geographies of Interest

The contractor shall develop the "Required Estimates" for the "Participant Categories" for the following geographies as has been done in previous years:

- FNA regions,
- each of the 50 States,
- the District of Columbia,
- and five U.S. territories: the Commonwealth of Puerto Rico, the United States Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

The set of State-level (including territories) estimates, when summed, must align with national estimates.

For the CY2023 report, the contractor provided, for the first time, county-level eligibility count estimates in an Excel file. As described under Optional Task 8, the contractor shall develop county-level and Congressional District-level estimates of eligibility counts, participation counts, eligibility rates, coverage rates, and participation rates for 2024 and 2025[4] using the appropriate WIC PC data and 5-year ACS file using a methodology consistent with the national- and State-level methodologies. These estimates should be submitted as an Excel workbook with a separate tab for each State agency, and do not need to be included in the full report.

Other Participant Characteristics of Interest

The contractor shall also retain and update the following subgroup analyses as completed in recent reports (with updates specified below):

- Race/ethnicity
- Income
  - Updated for 2024/2025: Prior reports in this series have disaggregated eligibility by income level at the national level only. To inform WIC funding allocations to State agencies, the contractor shall prepare a table in the report that will display State agency-level counts of the eligible population by participant category (at a minimum: women, infants, and children) disaggregated into two income subgroups: (1) household income less than or equal to 185 percent of the Federal Poverty Guidelines, and (2) adjunctively-eligible for WIC and household income greater than 185 percent of Federal Poverty Guidelines.
- Urbanicity

[4] 2025 estimates shall be produced if the WIC PC 2026 characteristics data are available in time.

    - Updated for 2024/2025: WIC PC 2024 data now include WIC participant home ZIP code for most State agencies. The contractor will produce the required estimates for rural vs. urban areas using home ZIP codes from the WIC PC 2024 data.
- WIC non-participation among SNAP and Medicaid participants

Indian Tribal Organization (ITO) Estimates

Additionally, as described under Optional Task 7, the contractor shall build on the work under the prior contract to develop a methodology for ITO-level estimates. The contractor shall develop, as a separate task/CLIN, a final method to estimate WIC eligibility and coverage for ITOs. FNA will provide information collected from another study as well as a previously proposed methodology to inform this work as described in the task description below.

2024/2025 Report and Brief 2024 Report

The contractor shall deliver a 2024/2025 report, suitable for publication, which will list all data sources, describe methodologies and assumptions, present and discuss findings, and discuss limitations. This report, detailed in Task 3 (Main Report) below, shall include tables and full color maps for each year reported, and tables, full color maps, and other graphics to assist in understanding changes over time at the State level for each of the eight participant subgroups. The report will include separate estimates for 2024 and 2025. The contractor's level of detail in the estimates produced and in the discussion of these estimates shall meet or exceed the level of detail and discussion in the current series of WIC eligibility reports. Along with the 2024/2025 report, the contractor shall deliver Excel spreadsheets, not intended for publication, containing the estimates provided in the report.

New for the 2024/2025 report, the contractor shall produce a brief stand-alone executive summary that will highlight the key findings for a broader audience. The remainder of the current report would remain in its existing structure as the "Technical Report."

In addition to the 2024/2025 report, the contractor shall publish an abbreviated 2024 report to allow FNA to make publicly available the 2024 national-level estimates in a timely manner. This abbreviated report will not include an executive summary.

Data Inputs

Finally, if the necessary data are, or will be, available during the timeframe of this project, then the contractor shall update all of the various adjustment factors needed by the estimation methodology using the most recent data as they come available during this contract.

4. Government Furnished Items

FNA shall provide FNA administrative data and past contract deliverables as needed to support this effort. The contractor is responsible for securing data from non-FNA sources. The contractor shall assume that FNA needs 10 business days to fulfill any data requests.

5. Period of Performance

The period of performance shall be 18 months from the date of award. This is 6 months longer than the period of performance for prior contracts in this series to account for additional time that may be needed to develop ITO estimates and solicit feedback from ITOs.

6. Requirements Common to All Tasks

General operating constraints across all tasks under this contract include:

- The Contractor must maintain regular and open communication with FNA as part of project management and shall consult with FNA on all major aspects of the study.
- Each deliverable submitted to FNA should be in near-final form. Drafts shall not be submitted for FNA review without implementation of the Contractor's quality control plan as described in the Contractor's proposal. Deliverables that have not undergone editing for clarity, format, spelling, and grammar, are missing required sections, or do not adhere to the FNA-accepted study plan may be rejected without further review.
- All deliverables and materials produced by the Contractor shall demonstrate substantial expertise in the operation and administration of WIC, including program legislative and regulatory requirements, guidance, research, and program data.
- Final products for public dissemination provided by the Contractor shall be compliant with Section 508 of the Rehabilitation Act of 1973 (29 U.S.C. 794d) as amended by the Workforce Investment Act of 1998 (P.L. 105-220). Before acceptance, the Contractor will provide a completed USDA 508 Acceptance Checklist[5] for each public-facing document.
- All contact with WIC participants, FNA Regional Offices, State agencies, and any other program representatives or stakeholders must be approved by FNA prior to the attempted contact.
- The contractor shall submit all files (e.g., data, report, web, and other files) to FNA, and FNA shall retain all rights to all files produced under this contract.
- The final products (e.g., the final report and final online graphics) shall not be formally accepted as complete until cleared by USDA and published on FNA's website or other publication location(s) as agreed upon with FNA.

7. Tasks

Contractors shall allow three weeks (i.e., 15 business days) for FNA to comment on all interim deliverables, except for the revised analysis plan and all versions of the report, which require at least five weeks of review by FNA.

The contractor may propose more or fewer interim deliverables for all tasks, as appropriate to meet the project objectives.

[5] Available online at https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-information-officer/guidelines-and-compliance-resources/section-508-accessibility-and-compliance/section-508-checklists.

Task 1: Project Management

The contractor shall propose deliverables and milestones to ensure proper and efficient project management.

The contractor shall undertake all activities necessary to manage a project of this scope. This task includes, but is not limited to, orientation meetings, routine and non-routine meetings with the FNA Contracting Officer's Representative (COR) to discuss issues of importance to the project, and monthly progress reports.

Orientation Meeting
Within two weeks after contract award, the contractor shall provide a draft agenda to FNA and work with FNA to schedule the orientation meeting. The purpose of this meeting is to refine expectations for the project, discuss and address potential challenges and concerns, and review the schedule of deliverables. Examples of specific topics to be addressed at this meeting shall include, but not be limited to:

- mutual understanding of project objectives and priorities;
- overview of the methodology, data collection activities and data sources;
- contract schedule, including milestones, dates for submission of deliverables, and required timeframes for clearance activities (data collection and reports);
- formats for reporting data collection and general project progress;
- protocols for all communications between the COR, National Office and regional FNA staff;
- confirmation of staffing; and
- potential challenges and possible strategies to successfully address them.

Within one week after the orientation meeting, the contractor shall submit to FNA the draft Summary Memorandum documenting the discussion. It shall summarize the meeting, including an elaboration of project objectives, decisions reached, and identification of any outstanding issues and strategies for resolving them. The final meeting summary shall incorporate FNA's comments and be provided to FNA within one week of receiving FNA feedback.

Ongoing Communication
Ongoing communication is necessary to ensure successful completion of this service component, and should be both verbal (e.g., regularly scheduled conference calls) and written (e.g., monthly progress reports). The contractor will propose a schedule for biweekly telephone communications to update Federal staff on progress and issues. Key contractor staff, subcontractor staff, and/or consultants will participate as needed to address progress and issues for discussion. The schedule for these discussions may be changed as agreed upon by the COR. The contractor will submit a proposed agenda for each call at least one (1) working day in advance of the scheduled date to the COR for comment. If there are materials that Federal staff will need to review prior to the call date, such materials will be submitted at least three (3) business days in advance of the call date. The contractor will submit a summary of telephone discussions to the COR for review and approval no later than three (3) working days after each regular telephone conference call.

Monthly Progress Reports
By the fifteenth of every month, unless the COR and contractor agree upon an alternate date, the contractor shall submit progress reports covering work accomplished during each month of contract performance to the COR. The progress reports shall be brief and factual and shall be prepared in accordance with the following format:

1. Section I: An introduction covering the purpose and scope of the contract effort. This shall be limited to one paragraph in all but the first and final month's report.

2. Section II: A description of overall progress plus a separate description of each task or other logical segment of work on which effort was expended during the reporting period. The description shall include pertinent data and/or graphs in sufficient detail to explain any significant results achieved.

3. Section III: A description of current technical or substantive performance, and any problems which may impede performance along with proposed corrective action.

4. Section IV: A planning schedule shall be included with the first progress report for all tasks required under the contract, along with the estimated starting and completion dates for each task. The planning schedule shall be updated and submitted with each subsequent technical progress report and shall include explanation of any difference between actual and planned progress, why the differences have occurred, and what corrective steps are planned if behind in progress.

Deliverable 1.1 Orientation Meeting Agenda
Deliverable 1.2 Orientation Meeting Summary Memorandum
Deliverable 1.3 Monthly Progress Reports

Task 2: Analysis Plan

The contractor shall provide a write-up of the proposed methodology to FNA for review and comment. The contractor shall consult with independent experts in developing its methodology. The contractor shall emphasize the new methodologies under this contract (e.g., county/Congressional-district level estimates and ITO estimates) when considering expertise. The independent experts proposed by contractors will be taken into account when evaluating the technical strength of contractors' proposals. The write-up shall address the objectives of the project as described above. It shall describe the data sources to be used, the proposed analytic methodology and assumptions, and all data and methodological limitations. The analysis plan shall also include tables shells and figures for any newly proposed tables and figures, as needed. After FNA review of the proposed analysis plan, the contractor shall submit a revised version of the analysis plan, and after an additional round of comments from FNA, the contractor shall submit a final version of the plan.

The contractor shall describe in the analysis plan how they will use participant ZIP codes from the appropriate WIC PC data year to produce the urban/rural coverage rates in place of using WIC local agency location as has been done in the past. The contractor shall also describe in the analysis plan how they will use participant ZIP codes to produce county-level and Congressional-District-level estimates as described under Optional Task 8 of this PWS. FNA shall provide the contractor with relevant or summarized WIC PC 2024 data and data documentation. FNA shall provide the WIC PC 2026 data if available in time. Participant ZIP code was provided by 66 of 88 State agencies for WIC PC 2024, and approximately 90% of those participants have an available ZIP code. Participant ZIP code was provided for the first time in WIC PC 2024; the WIC PC 2024 report is not yet publicly available, but the WIC PC 2022 report can be found online.[6]

Deliverable 2.1 Draft Analysis Plan
Deliverable 2.2 Revised Analysis Plan
Deliverable 2.3 Final Analysis Plan

Task 3: Main Report

The contractor shall prepare draft, revised, and final versions of the 2024/2025 report that detail the steps in the estimation process, describe the data sources, and present findings. The stand-alone executive summary of

[6] Available online at https://www.fns.usda.gov/research/wic/participant-program-characteristics-2022

findings is new for this year and will be a streamlined version of the 2024/2025 report, and focused on key findings for a broad, non-technical audience. In addition, there will be a brief, approximately 5-page national-level 2024 report that the contractor shall develop as soon as possible so that FNA can make publicly available the 2024 national-level estimates as soon as possible. At a minimum, the 2024/2025 final report shall include the level of detail, tables, and graphics found in the most recent National and State Level Estimates of WIC Eligibility and Program Reach in 2023 report, incorporating revisions from FNA to streamline the report,[7] which explicitly includes the following:

1. a stand-alone executive summary of findings, and
2. a stand-alone full technical report that includes, at a minimum:
   a. an introductory statement of objectives;
   b. a discussion of methodology, assumptions, and data sources used;
   c. a presentation and discussion of results;
   d. a discussion of methodological and data limitations;
   e. a set of tables and full color U.S. maps displaying State and FNA region estimates for each year;
   f. tables, full color maps, charts, and other graphics to assist in understanding changes over time at the national, FNA regional and State levels;
   g. references; and
   h. relevant appendices.

The contractor shall submit both the full technical report and executive summary as both a Word document and a PDF file. All graphics in the report must be editable.

Deliverable 3.1	Draft brief CY2024 Report (5-pages or less)
Deliverable 3.2	Revised brief CY2024 Report (5-pages or less)
Deliverable 3.3	Final brief CY2024 Report (5-pages or less)
Deliverable 3.4	Draft 2024/2025 Report Outline
Deliverable 3.5	Final 2024/2025 Report Outline
Deliverable 3.6	Draft 2024/2025 Report
Deliverable 3.7	Revised 2024/2025 Report
Deliverable 3.8	Final 2024/2025 Report

Task 4: Data and Code

The contractor shall provide to FNA all datasets and code used to produce tables and figures for Task 3 (Main Report) in a format agreeable to FNA that includes the raw data files and data analytic files used to produce all results that appear in each draft and final report. In addition, the contractor shall provide Excel spreadsheets with all of the data in the tables and graphs presented in the report. The data files shall not include any information which would compromise participant privacy including names, addresses or other personal identifiers. With each version of the main report, the contractor shall submit all data files that were used to create the drafts including the first draft, revised draft, final draft, and the published final report. This deliverable shall include the SAS and/or R code and results for the new county-level analysis described above. The data files should demonstrate contractor's ability to reproduce prior year's results. Additionally, the contractor shall review prior code and make improvements to ensure clarity for future users. Even though this contract will be producing estimates for two years, FNA generally produces estimates for one year at a time, so the code should be easily usable to produce estimates for only one year. These files shall be provided for use with SAS, R, or other suitable analytic software selected by FNA. In addition, the contractor shall provide full documentation for these data files including:

- information on how to obtain all raw files (source of all raw files, raw file version dates, etc.);

[7] Available online at https://www.fns.usda.gov/research/wic/eer-2022

- file structure (data set name, record format, number of records);
- code book (record layout including variable name, variable format, variable labels, value labels, and missing values);
- variable definitions;
- imputation procedures (if used);
- editing procedures used;
- structure of composite variables, and
- fully commented SAS/R and all other code to allow full replication of analyses at FNA, other government agencies, and their contractors.

Deliverable 4.1 Preliminary Data Files, Data Documentation, Tabulations, Graphs, Figures, and Maps with Data Cleaning and Analytic Code
Deliverable 4.2 Revised Data Files, Data Documentation, Tabulations, Graphs, Figures, and Maps with Data Cleaning and Analytic Code
Deliverable 4.3 Final Data Files, Data Documentation, Tabulations, Graphs, Figures, and Maps with Data Cleaning and Analytic Code

Task 5: Briefing

The contractor shall conduct a virtual briefing for FNA managers and staff between submission of the revised and final reports. The briefing shall discuss, at a minimum, changes made to the methodology during the most recent estimation year, the analysis, data sources, and final results of the project. The presentation shall include handouts or other visual display materials. These materials shall be prepared in PowerPoint or similar format that is agreeable to FNA. Visual display materials and handouts shall be submitted to FNA for review two weeks prior to the presentations. Any files, including PowerPoint files, submitted at this time should be editable by FNA.

Deliverable 5.1 Draft Briefing Materials
Deliverable 5.2 Final Briefing Materials

Task 6: Interactive Online Graphics of Report Results

The contractor shall produce interactive, online graphics of the final report results, with interactive maps, charts, graphics, etc. At a minimum, this work shall include updating and revising the existing WIC eligibility graphics posted on the FNA website.[8] The contractor shall work with FNA to ensure that all web deliverables function as intended on the FNA website. The contractor shall propose interim deliverables and deliverable dates as appropriate, with the final website deliverables due no more than two months after delivery of the final draft of the report.

Deliverable 6.1 Draft Online Graphics Update Plan
Deliverable 6.2 Final Online Graphics Update Plan
Deliverable 6.3 Draft Online Graphics
Deliverable 6.4 Final Online Graphics

[8] Available online at https://www.fns.usda.gov/research/wic/eer/.

OPTIONAL - Task 7: ITO Estimates

FNA will provide the contractor with the ITO Analysis Plan developed under the 2023 report contact as well as relevant information on the WIC Tribal Organizations and U.S. Territories Study (see Appendix A). If FNA elects to execute Optional Task 7, the contractor shall implement the approach proposed in the prior ITO Analysis Plan or propose acceptable alternatives to develop a final method to estimate WIC eligibility and coverage for ITOs. This methodology will be informed by information provided by FNA from their WIC Tribal Organizations and U.S. Territories Study. The methodology should also include a proposal of how to update ITO estimates annually or bi-annually, if feasible. The contractor shall produce preliminary program reach estimates for ITOs and collect feedback on the estimates from the ITOs. Collecting feedback from ITOs will likely require a generic OMB clearance; FNA will complete any required clearance steps to solicit ITO feedback, so the contractor should not include work on an ICR in their proposal. It will be the contractor's role to develop methods to collect feedback materials (e.g., survey, discussion guide) and to collect feedback on the estimates from the ITOs, but it will be FNA's role to write and submit the paperwork to obtain generic OMB clearance. The contractor shall provide FNA with the feedback solicitation materials (e.g., survey, discussion guide) so that FNA can submit them to obtain generic OMB clearance. The contractor may propose additional deliverables beyond those listed below.

Deliverable 7.1 Prepare preliminary reach metrics and receive Tribal Organization feedback
Deliverable 7.2 Draft memo describing recommended tailored program reach metrics
Deliverable 7.3 Final memo describing recommended tailored program reach metrics

OPTIONAL - Task 8: County and Congressional District-Level Estimates

If FNA elects to execute Optional Task 8, the contractor shall develop county and Congressional District-level eligibility, coverage, and participation rate estimates.

Under the CY2023 contract, the contractor provided FNA with internal county level eligibility count estimates for the first time, which FNA will provide following the award of this contract. The contractor will likely need to use 5-year ACS estimates again for the county level analysis, unless there is the potential to pool fewer years for the Congressional District level estimates.

Participation counts (the numerator) will be obtained from the latest available WIC PC data. The contractor shall use participant ZIP codes from the latest available WIC PC data,[9] for the States agencies where it is available, to produce sub-State estimates. For State agencies where participant ZIP code is not available, the contractor shall present eligibility counts and rates, but not coverage or participation rates. FNA shall provide the contractor with relevant or summarized WIC PC data and data documentation. Participant ZIP code was provided for the first time in WIC PC 2024.[10] The contractor shall propose a methodology for using participant ZIP code data from the latest available WIC PC data to produce Congressional District-level and county-level participation and coverage rates in the Analysis Plan delivered under Task 2. The contractor will use the agreed upon methodology to produce the estimates.

---

[9] As WIC PC 2026 is ongoing, we do not know whether CY2025 data from WIC PC 2026 will be available in time. If yes, sub-State level estimates should be calculated for CY2025. If not, local level estimates should be calculated for CY2024. Participant ZIP code was provided by 66 of 88 State agencies for WIC PC 2024, and approximately 90% of those participants have an available ZIP code.
[10] Participant ZIP code was provided by 66 of 88 State agencies for WIC PC 2024, and approximately 90% of those participants have an available ZIP code. The WIC PC 2024 report is not yet publicly available, but the WIC PC 2022 report can be found online. Zvavitch, P., Beckerman-Hsu, J., Huret, N., Perez-Zetune, V., Reischmann, P., & Calvin, K., and Thorn, B. (2024). WIC Participant and Program Characteristics 2022. U.S. Department of Agriculture, Food and Nutrition Service. Access online at https://fns-prod.azureedge.us/sites/default/files/resource-files/wic-ppc-2022-report.pdf.

The contractor shall produce Excel tables with the counts and rates. FNA may then produce public-facing and/or internal dashboards or publications using the data or may share the data with WIC State agencies. The Excel tables should include the following: estimates delivered by county and by Congressional district, disaggregated separately by women, infants, and children:

- Number of individuals, regardless of income eligibility
- Number of individuals eligible for WIC
- Number of individuals participating in WIC
- Participation rate
- Eligibility rate
- Coverage rate

Deliverable 8.1 Draft local level Excel tables
Deliverable 8.2 Revised local level Excel tables
Deliverable 8.3 Final local level Excel tables

8. Schedule of Deliverables

The proposed schedule shall allow FNA at least an equal amount of time to review deliverables as the amount of time the Contractor plans to take to revise them. The contractor shall propose deliverable due dates for those not listed in the table below. Alternative deliverable due dates and formats may be suggested by the Contractor. All deliverables listed in the below table are the minimum deliverables requested, and there is no restriction from the inclusion of additional deliverables in your proposal.

Deliverable Number	Deliverable Name	Format	Due Date
1.1	Orientation Meeting Agenda	.docx	2 weeks from award
1.2	Orientation Meeting Summary Memorandum	.docx	3 weeks from award
1.3	Monthly Progress Reports	.docx	On or about 15th of each month
2.1	Draft Analysis Plan	.docx	
2.2	Revised Analysis Plan	.docx	
2.3	Final Analysis Plan		
3.1	Draft brief CY2024 Report (5-pages or less)	.docx	
3.2	Revised brief CY2024 Report (5-pages or less)	.docx	
3.3	Final brief CY2024 Report (5-pages or less)	.docx, .pdf	
3.4	Draft 2024/2025 Report Outline	.docx	
3.5	Final 2024/2025 Report Outline	.docx	
3.6	Draft 2024/2025 Report	.docx	
3.7	Revised 2024/2025 Report	.docx	
3.8	Final 2024/2025 Report	.docx, .pdf	By July 31, 2027 (earlier is also acceptable)
4.1	Draft Data and Analytic Files	.docx, .pdf, .sas, .r	With 3.6 Draft Report
4.2	Revised Data and Analytic Files	.docx, .pdf, .sas, .r	With 3.7 Revised Report
4.3	Final Data and Analytic Files	.docx, .pdf, .sas, .r	With 3.8 Final Report
5.1	Draft Briefing Materials	.docx, .pdf, .ppt	
5.2	Final Briefing Materials	.docx, .pdf, .ppt	After delivery of 3.7 Revised Report, but prior to submission of 3.8 Final Report.
6.1	Draft Online Graphics Update Plan	.docx	
6.2	Final Online Graphics Update Plan	.docx	
6.3	Draft Online Graphics	Varied	
6.4	Final Online Graphics	Varied	

7.1	OPTIONAL - Prepare preliminary reach metrics and receive Tribal Organization feedback	.docx, .pdf	
7.2	OPTIONAL - Draft memo describing recommended tailored program reach metrics	.docx	
7.3	OPTIONAL - Final memo describing recommended tailored program reach metrics	.docx	
8.1	OPTIONAL - Draft Local Level Excel Tables	.xlsx	
8.2	OPTIONAL - Revised Local Level Excel Tables	.xlsx	
8.3	OPTIONAL - Final Local Level Excel Tables	.xlsx	

9. Performance Requirement Summary

The Government intends to utilize a Quality Assurance Surveillance Plan (QASP) to monitor the quality of the Contractor's performance. The oversight provided for in the contract and in the QASP will help to ensure that service levels reach and maintain the required levels throughout the contract term. Further, the QASP provides the COR with a proactive way to avoid unacceptable or deficient performance, and provides verifiable input for the Contractor Performance Assessment Reporting System (CPARS). The QASP may be updated by modification to the contract.

Required Services/Tasks	Performance Standards	Method of Surveillance (Quality Assurance)	Standard to be Met/ Allowable Deviation
Quality Assurance	Contractor maintains high level of quality assurance such that all work products delivered under this contract are of high-quality.	COR and Contracting Officer monitoring and review of activities and deliverables.	COR makes no more than two written complaints for the period of performance.
Timeliness	Contractor meets agreed upon timeframes for project activities and deliverables.	COR and Contracting Officer monitoring and review of activities and deliverables.	No more than one-week delay unless agreed upon, in writing, by COR in advance of the deadline/due date.
Contract Management	Contractor appropriately manages the project, including informing the COR of any challenges or issues in a timely manner and not after the fact.	COR and Contracting Officer monitoring of monthly progress reports, COR participation in regular project communication calls, and other ad hoc communication with the Contractor.	No instances of issues or problems being raised to the COR after the fact or after such time that no remedies are available.
Cost Control	Contractor manages the project budget to avoid cost overruns within task and overall budget, and notifies	COR and Contracting Officer monitoring of monthly progress reports, COR participation in regular project	Contractor shall operate within the budget for each CLIN and have no instances of cost issues

	the COR in advance of any potential budget concerns.	communication calls, and other ad hoc communication with the Contractor.	without raising to the COR in advance.
Written Products	Contractor provides high-quality written materials.	COR and other federal staff reviews of draft and final products.	Fewer than two rounds of revision with minimal rewriting, editing required. Product disseminated as planned.

Appendix A:

2023 WIC Eligibility Estimates, Deliverable 6.3 - Planning How to Develop Indian Tribal Organization (ITO) Level Measures of Program Reach

Note: The following was developed as a deliverable on a prior contract and delivered to FNA on December 23, 2024. Chapter 3 below was updated to include the final interview guide that will be fielded to all 32 Tribal Organization WIC directors under the WIC Tribal Organizations and U.S. Territories Study (OMB Control Number: 0584-0705). FNA is providing this to inform proposals for the work described under Task 7 of this PWS.

Chapter 1. Introduction

The U.S. Department of Agriculture's (USDA) Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) provides pregnant and postpartum women, infants, and children through age 4 with critical nutrition benefits and education. Currently, 88 State agencies administer WIC; these agencies include the 50 geographic States, 5 U.S. territories, 32 Indian Tribal Organizations (hereafter, Tribal Organizations)[11], and the District of Columbia. There is no one data source that enables programs or policymakers to directly count the number of individuals who are eligible for WIC in the geographic areas served by their State agency. The WIC Eligibility Estimates Report published by USDA's Food and Nutrition Service (FNS) provides national- and State-level eligibility counts (estimates of the number of individuals eligible for WIC benefits) and coverage rates (the percentage of the eligible population participating in WIC).[12] The data in this report guide funding decisions and help State agencies understand how many eligible individuals they are reaching.

Standalone estimates for Tribal Organizations that administer WIC as State agencies have historically not been included in the report because of methodological limitations. These limitations have led to minimal discussion of Tribal Organizations in previous reports. Instead, participants from Tribal Organizations have been included in the estimates for the State and FNS Region where the Tribal Organization is located. As a first step toward including program reach metrics for Tribal Organizations, the 2022 WIC Eligibility Estimates Report provided coverage rates for non-Hispanic, American Indian/Alaska Native individuals and included a new table of WIC Tribal Organization participant counts. The 2022 report also suggested a plan for developing Tribal Organization–level program reach metrics in appendix A.

This draft plan builds on the preliminary outline in appendix A of the 2022 WIC Eligibility Estimates Report and provides new details about how program reach metrics could be identified for Tribal Organizations. The Study Team proposes data collection procedures and describes potential program reach metrics. The plan has been informed by consultations with two technical experts, Dr. Carolyn Liebler and Melinda Newport. It also builds from the contract structure established by FNS. More specifically, The Study Team assumes that a separate project, WIC in the Territories and Indian Tribal Organizations (hereafter WIC in the Territories and Tribes), will be responsible for data collection activities to gather information needed to design a tailored program reach metric. The development of the program reach metrics and consulting with the Tribal Organizations about proposed metrics are not presently included in any contract. The Study Team assumes that the calculation of any program reach metric will occur after the data collection and review by FNS and each Tribal Organization. The program reach metrics may not be integrated into the annual report until the 2026 WIC Eligibility Estimates Report. The plan respects Tribal sovereignty and autonomy both in how the Study Team seeks to gather information and request feedback from Tribal Organizations.

A. Challenges Estimating WIC Eligibility Counts in Tribal Organizations Using Current Methods

Adding measures of WIC eligibility and program reach for Tribal Organizations to the WIC Eligibility Estimates Report would increase information about WIC programs and where individuals are eligible for and served by WIC. Under the existing methods, the analysis faces several methodological challenges. Each Tribal Organization represents a sovereign nation or a consortium of sovereign nations with unique WIC eligibility criteria (as long as those criteria meet minimum federal requirements at 7 CFR Part 246, e.g., related to

---

[11] Throughout this plan, we use the term Tribal Organization based on feedback from our technical advisors and report reviewers. We understand that Tribal Organizations may vary in whether they prefer to be referred to as a Tribal Organization, ITO, State agency, or another term. In interview questions, we guide interviewers to refer to the name of the Tribal Organization rather than a generic term.

[12] The report also provides estimates of the population eligible for WIC in the U.S. territories that administer WIC (American Samoa, Guam, Puerto Rico, the Commonwealth of Northern Mariana Islands, and the U.S. Virgin Islands) but has not yet included coverage rates for these territories.

categorical, income, nutritional risk, and residency). The traditional approach to the eligibility estimation procedures relies on geographic boundaries (i.e., State boundaries). Some Tribal Organizations represent multiple Tribes (e.g., Inter-Tribal Council of Nevada); others vary in how they define their geographic reach, especially in counties served by multiple State agencies. Differences in geography are compounded by differences in who is eligible to receive WIC benefits from some Tribal Organizations. While at least one Tribal Organization serves enrolled Tribal members across a geographic State (e.g., Mississippi Band of Choctaw Indians), others are more geographically limited to counties but also serve non-Tribal members (e.g., Osage Nation).

Tribal Organizations also sometimes face limitations on how many individuals they can serve because of available WIC funding. They may establish memoranda of understanding (MOUs) or other informal agreements with other State agencies to determine the proportion of the eligible population in an area they will serve. For these Tribal Organizations, a coverage rate may not be an appropriate indicator of how many more individuals they could serve without additional context about their capacity or service area limits.

Tribal Organization State agencies also have flexibility in setting eligibility criteria beyond geographic limits or Tribal enrollment. Some Tribal Organizations may exercise the alternative method for determining participant income eligibility outlined in 7 CFR 246.[13, 14] This regulation enables Indian households to enroll with a signed statement that they are at or below the income threshold rather than a formal documentation of income, given that the Tribal Organization has submitted demographic information establishing that most Indian households in its service area have incomes at or below the threshold, and received FNS approval on approach. Like other State agencies, Tribal Organizations can identify whether participation in other safety net programs establishes automatic or adjunctive income eligibility. Programs like the Food Distribution Program on Indian Reservations (FDPIR) may serve significant numbers of individuals; understanding variation in whether these services confer eligibility is important for estimating the eligible population. Our team has learned that some Tribal Organizations' residency requirements include either residing within the Tribal Organization's boundaries or receiving services through Indian Health Services (IHS). the Study Team also need to understand whether there is a reliable data source recording the number of individuals who participate in FDPIR, IHS, or other relevant programs.

The Study Team also faces challenges accessing data that would provide the information needed to calculate a traditional coverage rate. The surveys used to produce the eligibility estimates (i.e., the Annual Social and Economic Supplement of the Current Population Survey and the American Community Survey) include only small numbers of individuals from WIC Tribal Organizations, raising concerns about whether these surveys provide representative or adequate data for Tribal Organizations. Other data sources used to create adjustment factors (e.g., breastfeeding data from the Centers for Disease Control and Prevention, income data from the Survey for Income and Program Participation) also do not have enough respondents from Tribal Organizations to provide data needed for the estimation procedures. Even where coverage rates could be produced, the study team anticipates most rates to have very wide confidence intervals, perhaps ranging from 0 to 100 percent, because of sample size limitations.

B. Recent Updates and Proposed Next Steps

We improved the WIC eligibility estimates for fiscal year 2022 in two ways:

- We produced measures of WIC eligibility and program reach for non-Hispanic, American Indian/ Alaska Native individuals and enhanced the discussion of Tribal Organizations in the report. These

[13] Special Supplemental Nutrition Program for Women, Infants, and Children, 7 CFR §246 (2014). https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-246#p-246.7(d)(2)(viii)

[14] The project team does not know if any Tribal Organizations currently exercise the alternative method for determining participant income eligibility outlined in 7 CFR §246.

improvements include national coverage rates for individuals who identify as non-Hispanic, American Indian/Alaska Native and the monthly average number of WIC participants in Tribal Organizations.

- We added confidence intervals for coverage rates and other reach metrics in the report tables.

These improvements were made in close consultation with FNS. They are a product of the review of extant literature, two technical expert panel meetings (which included two academics with expertise in analyzing issues facing Tribal communities using nationally representative surveys and the U.S. Census), and consultations with representatives from FNS Regional Offices and FNS Tribal Affairs. However, in the face of the challenges mentioned above, these improvements were designed only to provide more detailed yet preliminary information about American Indian/Alaska Native individuals in the timeframe provided for the 2022 report.

Looking forward, the Study Team developed a set of preliminary recommendations for producing more robustly tailored coverage rates for Tribal Organizations. The Study Team identified two overarching themes pertaining to Tribal Organization reach metrics. First, Tribal Organizations vary in many aspects that affect the estimation of any WIC reach metric (e.g., residency or Tribal membership requirements, defined reach, MOUs between WIC State agencies establishing participation limits). Second, the perspectives of all Tribal Organizations should be incorporated in any effort to provide a metric of Tribal Organization WIC reach. In the 2022 WIC Eligibility Estimates Report, the Study Team recommended that efforts to produce Tribal Organization coverage rates or other reach metrics be tailored to individual Tribal Organizations and developed with significant input from each Tribal Organization.

The remainder of this plan describes more detailed steps for producing tailored reach metrics developed in consultation with Tribal Organizations. Key steps include further consulting with experts in WIC operations in Tribal Organization settings, collecting data from all 32 Tribal Organizations, using the collected data to inform a selection of program reach metrics tailored to available data and Tribal Organization policies, and sharing the plan with Tribal Organizations to confirm that the measure selection is appropriate.

Chapter 2. Approach to Tailoring Reach Metrics

This chapter describes the proposed approach for identifying appropriate, meaningful, and feasible reach metrics for each of the 32 Tribal Organizations. As with the initial stages of developing an approach to better represent Tribal Organizations in the WIC Eligibility Estimates Report, all aspects of this work should be done in consultation with Indigenous and Native American individuals and Tribal Organizations. Options for tailoring will be further limited by available data.

The first stage includes consulting with experts and individuals with lived experience to determine the most effective ways to understand how reach metrics would best fit each Tribal Organization (section A). Next, the Study Team proposes a primary data collection effort to collect information from all Tribal Organization State agencies about their program policies, local data, and current approaches to measuring program reach (section B). After gathering these data, the study team will synthesize the information and select a program reach metric for each Tribal Organization (section C). Lastly, the Study Team recommends presenting the plan to representatives from each Tribal Organization to gather feedback and incorporate this feedback into the final approach implemented for the WIC Eligibility Estimates Report (section D).

A. Consultation

The development of this plan has been informed by consultations during the development of the 2022 WIC eligibility estimates and conversations with two experts, Dr. Carolyn Liebler and Melinda Newport. Dr. Liebler brings years of experience working with Tribes and survey data; Newport is a former WIC director of Chickasaw Nation and has direct experience administering WIC. Both experts have reviewed the draft list of questions; they also reviewed the revised list of questions concurrent with the FNS review of the revised plan (Task 6.2).

Beyond the work to inform this plan, the Study Team recommends continued consultations to inform the data collection, data cleaning, and selection of program reach metrics. The WIC in the Territories and Tribes project team will be responsible for collecting data. That project includes a technical working group (TWG) and participant experience council (PEC) to inform all aspects of the project. The Study Team recommends that the WIC in the Territories and Tribes project team consult with both the TWG and the PEC to finalize questions and inform approaches to data collection. For example, the WIC in the Territories and Tribes project team plans to ask about preferred ways of referring to Tribal Organizations (e.g., ITO, Tribal Organization, WIC State agency).[15] The team also plans to focus on instruments during the second TWG meeting and the first PEC meeting. The Study Team recommends that both the TWG and PEC provide feedback on the discussion questions, including whether the language is clear and appropriate. The Study Team also recommends the TWG discuss the informed consent process. For example, the Study Team suggests exploring how and when to share a written document explaining the purpose of the study, language used in this form, and consent expectations of Tribal Institutional Review Boards. The Study Team recommends asking about norms and expectations for whether a list of topics should be shared before the scheduled interview.

B. Primary Data Collection

The project team's initial exploration of strategies to produce coverage rates or other program reach metrics for Tribal Organizations identified several unknowns. Most critically, little documented information exists about how Tribal Organizations defined their service areas or target populations. There was also little information about how Tribal Organizations set eligibility criteria or whether they assessed program reach locally.

[15] We recommend the WIC in the Territories and Tribes project team update all references to Tribal Organizations or State agencies in our draft interview questions (see chapter 3) to match the TWG recommendations.

Understanding whom Tribal Organizations serve and how they establish eligibility for WIC is essential for estimating the number of individuals eligible for WIC under their program. Discussions with FNS representatives clarified that these implementation factors vary significantly across Tribal Organizations, without a source tracking these differences.

To consistently and methodically gather this information, the Study Team proposes conducting a series of interviews with WIC directors from each of the 32 Tribal Organizations that serve as State agencies. Questions should address eligibility criteria consistent with the categorical, income, nutritional risk, and residency requirements stated in the regulations; local data sources; and understanding of program reach. The Study Team also recommend including questions about mapping. The WIC Eligibility Estimates Report includes 13 unique maps displaying coverage rates for the geographic States. The Study Team has heard varying opinions on whether and how maps should be used to represent Tribal Organizations; directly asking Tribal Organization State agencies is the clearest way to ensure mapping is culturally appropriate and helpful rather than harmful.

1. Data Collection Logistics

As noted earlier, FNS has funded a separate contract, WIC in the Territories and Tribes, to collect data from Tribal Organizations to better understand how WIC is administered in these settings. A separate contractor team was awarded that contract. The WIC in the Territories and Tribes project has several objectives; one is to collect the data needed to inform the development of Tribal Organization reach metrics. The Study Team will coordinate with FNS to provide the project team leading the WIC in the Territories and Tribes project with the final version of this plan, including a complete set of interview questions needed to produce reach metrics.

Because the data collection will include more than nine interviewees, the WIC in the Territories and Tribes project will need clearance from the Office of Management and Budget (OMB) to collect data. The WIC in the Territories and Tribes project will be responsible for receiving this approval. The data collection will also include an informed consent process.

2. Data Collection Design

To meet all objectives of the WIC in the Territories and Tribes project, that project team plans to conduct videoconference discussions with WIC directors of all 32 Tribal Organizations that operate as State agencies. For the approximately 15 Tribal Organizations selected to participate in a more in-depth site visit, these discussions will also be a time to plan the timing and content of the site visits. Although data collection strategies will vary depending on whether the Tribal Organization will receive an in-person visit, the Study Team proposes including core questions about program reach in the initial videoconference discussion. Including these questions before the in-person component will allow for more informed follow-up during the site visit. This structure will also provide key information needed for the WIC Eligibility Estimates team to begin developing tailored reach metrics.

We expect that some of the questions may not be able to be answered during the initial videoconference discussion. Although the WIC in the Territories and Tribes site visits will provide an opportunity for follow-up questions, these visits will only occur for a limited number of Tribal Organizations that operate as State agencies. The Study Team proposes structuring two additional opportunities for receiving this critical feedback:

- **Follow-up emails.** During the videoconference discussions, the Study Team recommends sharing the project team's contact information and clarifying that the Tribal Organization representative can provide additional information through email if needed. The project team will send a list of outstanding questions to the Tribal Organization representative following the videoconference discussion and request a written response.

- **Follow-up member checks.** Following the development of the tailored project reach metric, the Study Team recommends inviting each Tribal Organization to review the proposed metric, preliminary findings, and the best approach to presenting the findings during a videoconference. This meeting is not included under the WIC in the Territories and Tribes contract nor the current WIC Eligibility Estimates contract. The member checks are currently out of scope and would need to be covered under a new contract. This study component would require generic OMB clearance.

Chapter 3 includes the draft questions our team will provide to the WIC in the Territories and Tribes project team. It also includes questions the Study Team plans to ask during the follow-up member checks.

3. Cleaning and Analysis

After the videoconference discussions, the WIC in the Territories and Tribes project team will prepare an Excel file summarizing responses to checklist questions (see table 4) and excerpts from transcripts with responses to the remaining questions. The WIC in the Territories and Tribes project team will clean the data and provide them to the WIC Eligibility Estimates team for analysis. The Study Team proposes providing an overall quantitative summary of the findings to FNS. If the information the Tribal Organization provides conflicts with other sources, the study team proposes the following:

- If interview data conflict with the information in the State Plan, The Study Team will use the information the Tribal Organization staff provided during the interview. If the item is a key data point, The Study Team will consider the appropriateness of following up with the interviewed staff via email.
- If data received at the local level are inconsistent with national-level data, The Study Team will prioritize local-level data. The Study Team anticipates local-level data will be more reliable and contain more granular and additive information (rather than replacing publicly available national data).
- We will address any other inconsistencies between data sources on a case-by-case basis.

The core use of the data will be to identify an appropriate reach metric for each Tribal Organization. The WIC Eligibility Estimates team will review the data and identify any needs for additional clarification that could occur during the site visits. If the Tribal Organization is not participating in a site visit, these questions will be addressed in follow-up emails or during the follow-up member checks. The data will also be used to develop preliminary program reach metrics.

C. Approach to Tailoring Methods

Once the videoconference data are available, The Study Team will review the responses to identify tailoring approaches. In our tailoring efforts, the Study Team plans to prioritize several factors. Program reach metrics—

- Should be culturally appropriate and meaningful for the Tribal Organization
- Must have updated data available on a regular timeline (ideally annually) to support ongoing updates of the metric
- Should be easy to summarize and interpret
- Would benefit from being as consistent as possible across Tribal Organizations (and State agencies more broadly)

Although tailoring will need to be informed by what the Study Team learns during the primary data collection stage (videoconference), the Study Team has identified several potential options for program reach metrics (see table 1). Based on the results of data collection, The Study Team will attempt to match each Tribal Organization with a program reach metric. The options provided in table 1 may not be exhaustive; additional options will be

identified as needed. All options in table 1 would use the Tribal Organization participant counts from FNS administrative data as the numerator of the coverage rate, consistent with coverage and participation rate measures currently included in the WIC Eligibility Estimates Report.

Table 1. Sample program reach metric options

Reach metric	Definition	Data requirements	Limitations
Coverage rate: Tribal Organization geography	Ratio of WIC participants to the number of individuals eligible within the geographic bounds of the Tribal lands covered by the Tribal Organization	▪ Local source of data, including counts of individuals eligible for WIC in the Tribal Organization defined by the Tribal Organization geography	▪ Many Tribal Organization service areas are not restricted to Tribal lands ▪ Currently known data sources do not provide data at the Tribal Organization level; this reach metric would require a local data source ▪ This approach would affect the interpretation and/or calculation of the geographic State coverage rates
Coverage rate: Tribal Organization membership	Ratio of WIC participants to the number of enrolled Tribal members	▪ Local source of data, including counts of Tribal members who are categorically eligible for WIC	▪ Many Tribal Organizations do not restrict WIC eligibility to Tribal members ▪ Tribal membership data would be local and may be sensitive. Although the Study Team can minimize these concerns by requesting summary information, this might require Tribal Organizations to summarize the data, adding potential burden
Coverage rate: county-based	Ratio of WIC participants to the number of individuals eligible within the counties served by the Tribal Organization	▪ List of counties served by the Tribal Organization ▪ Understanding that all residents eligible for WIC in the counties could participate (e.g., not limited by race or Tribal membership)	▪ Tribal Organization and geographic State agencies may overlap within counties ▪ This approach would affect the interpretation and/or calculation of the geographic State coverage rates
Coverage rate and capacity limit	Ratio of WIC participants to the number of individuals eligible (by county or Tribal land), with a visual marking the highest coverage rate possible under capacity/funding limits	▪ Same as above; specific details on the capacity/funding limits faced by the agency	▪ Capacity/funding limits may change over time ▪ Funding limits may also affect geographic State agencies
Participation rate: county-based	Ratio of WIC participants to the number of individuals within the counties served by the Tribal Organization	▪ List of counties served by the Tribal Organization ▪ Requires less information about eligibility criteria	▪ Participation rates are less regularly cited than the coverage rates ▪ Tribal Organization and geographic State agencies may overlap within counties
Participation rate: Tribal Organization	Ratio of WIC participants to the number of individuals within the geographic bounds of the Tribal lands covered by the Tribal Organization	▪ Local source of data, including counts of individuals in the geographic bounds of Tribal lands	▪ Participation rates are less regularly cited than the coverage rates ▪ Many Tribal Organizations are not restricted to Tribal lands ▪ Requires a local data source on population within Tribal lands
Coverage or participation rate using proxy measures	Use of Indian Health Service birth information or Medicaid data as a proxy	▪ Number of births tracked by Indian Health Service; income and program participation information ▪ Local Medicaid statistics (county or Tribal Organization)	▪ Publicly available data do not provide detail needed; would require Tribal Organizations to provide local data to the project team or FNS ▪ WIC eligibility does not directly align with Medicaid participation or involvement in the Indian Health Service

The Study Team will examine which reach metric options are possible for each State agency and prepare a memo that details possible options, recommended options, and the rationale for these recommendations. The memo will also include feedback on whether it is feasible to provide a reach metric only for total participants or if the Study Team believes the data are sufficient to stratify by participant category or race and ethnicity. The Study Team expects challenges with these stratifications; the Study Team further expects that any race and ethnicity stratification would focus on American Indian/Alaska Native race rather than the four categories currently used in the WIC Eligibility Estimates Report. The Study Team will provide this memo to FNS for review and finalize it after receiving FNS feedback.

D. Tribal Organization Feedback

In addition to receiving FNS feedback, the Study Team recommends requesting feedback from each Tribal Organization on the program reach metric selected for it. This feedback process should occur before publishing any metric. In particular, the Study Team recommends a phone (or, when possible, in-person[16]) discussion that includes the following elements:

- Description of the program metric and rationale for selecting the reach metric
- Discussion of whether the program reach metric is meaningful and appropriate for the Tribal Organization
- Discussion of what context would be helpful to include to explain the reach metric and its limitations
- Discussion of whether the Tribal Organization would like the reach metric to be included in the annual WIC Eligibility Estimates Report

We propose audio-recording the discussions, with respondents' permission, and taking detailed notes to supplement the recordings. Following the discussion, the study team will prepare and send a summary memorandum to the Tribal Organization that details key discussion points and recommendations. The Study Team will also provide FNS with a final memorandum synthesizing key findings and recommendations from across the Tribal Organizations.

We included the last topic—the discussion of whether the reach metric should be included in the WIC Eligibility Estimates Report—at the suggestion of our technical experts. While one original aim of the project is to expand the representation of Tribal Organizations in the annual report, it is possible that Tribal Organizations might not want their data to be disseminated in this way, especially because of anticipated data limitations. The Study Team again defers to Tribal sovereignty and recommend specifically asking each Tribal Organization how it would want to receive this information. If agencies are concerned about including their reach metric in the annual report, the Study Team recommends offering to provide a one- to two-page summary tailored to each Tribal Organization with an overview of their program reach and national WIC eligibility and coverage rates.[17] The Study Team would ask Tribal Organizations about what content would be most helpful for them to see in the summaries (e.g., national or State estimates). However, the Study Team also recognize that the data FNS collects or produces is subject to the Freedom of Information Act (FOIA), which requires Federal agencies to disclose any information as requested unless doing so poses a risk to personal privacy. The Study Team will make clear the implications of FOIA with each Tribal Organization.

The WIC in the Territories and Tribes project timeline, design, and site visit procedures are not sufficient for our team to receive feedback on the proposed program reach metric from all 32 Tribal Organizations operating

[16] The WIC in the Territories and Tribes project site visits may provide an opportunity to share the proposed plan with Tribal Organizations selected for a site visit. However, we anticipate that we may pursue generic OMB clearance to follow up with all Tribal Organizations.

[17] At FNS option, we could also provide a plan for producing summaries for all 88 WIC State agencies.

as State agencies through that contract. The Study Team will request generic clearance from OMB to allow us to contact all Tribal Organizations to review the proposed program reach metric. Following individual discussions with the Tribal Organizations, FNS may wish to share more information and receive feedback on next steps through an official Tribal Consultation. For example, FNS may wish to inform the Tribal Consultation attendees about the development of the program reach metrics for Tribal Organizations, request feedback on overall dissemination plans, or provide information about next steps FNS plans to take as a result of the findings.

E. Incorporating Program Reach Metrics Into the WIC Eligibility Estimates Report

Following data collection, metric selection, and opportunities for feedback, the project team will integrate the program reach metrics into written deliverables. The Study Team plans for the following preliminary deliverables:

- The Study Team will deliver two memos to FNS. The draft memo will summarize videoconference findings and initial proposals for program reach metrics. The final memo will summarize final decisions and recommendations for which measures to include in the WIC Eligibility Estimates Report.
- For all Tribal Organizations that would like their reach metrics included in the WIC Eligibility Estimates Report, The Study Team will present a summary of the reach metrics. The Study Team anticipates this will include a new chapter with contextual information about how the reach metrics differ from the eligibility estimates and coverage rates provided elsewhere in the report. Added content may include maps or other figures, pending feedback from Tribal Organizations.
- As recommended above, for all Tribal Organizations that would not like to have their reach metrics included in the WIC Eligibility Estimates Report, the Study Team recommends providing each Tribal Organization a standalone summary of the overall report findings and the reach metrics for the specific Tribal Organization. The summary would be sent to each WIC director.

The production of coverage rates for the Tribal Organizations operating as State agencies would raise a critical question about how State-level coverage rates are calculated and presented. State-level coverage rates are based on the geographic State identified in the address where a participant or eligible individual resides. State-level coverage rates are not the equivalent of WIC State agency coverage rates for States where Tribal Organizations are located. The Study Team currently addresses this issue by including footnotes in tables and figures, noting the Tribal Organization data are included in both the numerator (WIC participants) and denominator (individuals eligible for WIC) of the State-level coverage rates. Although identifying the number of WIC participants in each State agency is relatively easy, it is more challenging to determine the population eligible for WIC in areas where State agencies overlap. For example, individuals eligible for WIC living in certain counties in Oklahoma might be eligible to participate in WIC through *at least* two State agencies. The final decision about how to handle this issue should be informed by the reach metrics developed for the Tribal Organizations. However, the Study Team initially proposes the following approach:

- Continue to report coverage rates for the geographic States, clarifying that these coverage rates do not always align with WIC State agencies.
- Add a new chapter to the report with tailored program reach metrics for Tribal Organizations operating as State agencies that choose to be included in the report. Alternatively, this information could be included as a section in the coverage rate chapter. Because the Study Team is not sure whether all tailored reach metrics will be coverage rates, the Study Team preliminarily recommends a new chapter to allow for variation in reach metric approaches. This section should clearly note the limitations of all approaches.

- Depending on the number of Tribal Organizations that choose to be included, consider whether this new chapter should include coverage rates for *all* WIC State agencies instead of restricting this chapter to Tribal Organizations. This distinction would help clarify why Tribal Organization data are not included in the State-level coverage rate section and also explore the impact of splitting the Tribal Organizations from the geographic State agencies on State-level coverage rates.

F. Timeline

The next steps for developing tailored Tribal Organization reach metrics include refining this plan, gathering additional feedback, and collecting data. Table 2 provides the proposed timeline for these activities and identifies whether each activity is included under the current WIC Eligibility Estimates contract, the WIC in the Territories and Tribes contract, or has yet to be funded. The year-long data collection period for the WIC in the Territories and Tribes project incorporates time for individual Tribal Organization institutional review board approval. The Study Team anticipates that the videoconference data collection effort will be completed earlier in this window, with the site visits anticipated to last until April 2027. The Study Team proposes funding the development of the tailored coverage rates to follow the data collection effort.

Table 2. Proposed timeline for developing Tribal Organization reach metrics

Project	Deliverables	Due date
2023 WIC Eligibility Estimates	Task 6.1. Draft Tribal Organization Plan	October 24, 2024
	Task 6.2. Revised Tribal Organization Plan	November 27, 2024
	Task 6.3. Final Tribal Organization Plan	December 23, 2024
WIC in the Territories and Tribes	Task 5.6. OMB Clearance	May 2026 (Actual: June 2026)
	Task 6.2. Data Collection	Through April 2027
	Program reach data cleaned	TBD
Proposed	Prepare preliminary reach metrics and receive Tribal Organization feedback (requiring OMB generic clearance)	TBD
	Draft memo describing recommended tailored program reach metrics	TBD
	Final memo describing recommended tailored program reach metrics	TBD
	Development of draft report chapter and (if needed) summaries for Tribal Organizations	TBD

OMB = Office of Management and Budget; TBD = to be determined

G. Challenges and Mitigation Strategies

The development of program reach metrics for the Tribal Organizations faces several expected challenges and may encounter additional challenges as data collection unfolds. Table 3 lists anticipated challenges and mitigation strategies to help reduce or respond to each challenge. Our team will regularly communicate any new challenges with FNS through biweekly meetings, ad hoc emails, and monthly progress reports.

Table 3. Project challenges and mitigation strategies

Challenge	Mitigation strategy
Tribal Organizations may not be willing to participate in the project.	To encourage participation— ▪ We will regularly engage with our technical experts and the WIC in the Territories and Tribes TWG and PEC to ensure procedures are culturally appropriate. ▪ The WIC in the Territories and Tribes project embeds strategies to encourage high participation in the project, including developing tools that reduce burden, sharing information early with Tribal Organizations, and clarifying how the project will benefit Tribal Organizations. To address missing Tribal Organizations— ▪ We will work with FNS and technical experts to determine how to appropriately portray results for the subset of Tribal Organizations that participated in the project.
Tribal Organizations may share information during the first videoconference discussion that requires additional explanation or data.	▪ We plan to review the results from the first videoconference discussion before site visits. This will enable us to ask follow-up questions of Tribal Organizations selected for site visits. ▪ We recommend following up with Tribal Organizations not selected for site visits under a subsequent WIC Eligibility Estimates Call Order. If follow-up is needed with more than nine Tribal Organizations, The Study Team will seek generic OMB approval (e.g., for improving customer experience/service).
Data may not be available to support a program reach metric.	▪ We will ask Tribal Organizations how they assess program reach and will be open to providing a more limited measure (e.g., total population, program participant counts).
Tribal Organization policies that affect eligibility may change over time (e.g., if an agency faces a capacity limit).	▪ We will ask Tribal Organizations about the best way to learn about changes to their policies or constraints over time.
Individuals eligible for WIC can choose between participating in more than one State agency. Participating in one State agency will mean they would not be eligible in other State agencies.	▪ The study team will need to determine whether individuals can be counted in the denominator for more than one State agency. ▪ The study team anticipates leaving the current report as it stands but adding a new chapter that estimates participation for Tribal Organizations. This chapter will explain this limitation.

OMB = Office of Management and Budget; PEC = Participant Experience Council; TWG = Technical Working Group

Chapter 3. Interview Questions

A. Questions for All 32 Tribal Organizations Participating in the WIC in the Territories and Tribes Project Videoconference Discussion

This chapter is adapted from the list of interview questions proposed under the prior contract to reflect the final list interview questions that will be fielded to the 32 Tribal Organization WIC directors under the WIC Tribal Organizations and U.S. Territories Study (OMB Control Number: 0584-0705).

Improving Data for the WIC Eligibility and Coverage Rates Reports [State-Level Tribal Organization Virtual Interviews Only]

*[Interviewer note: These questions are asked during the interview of State Tribal Organization directors participating in **virtual** interviews; State Tribal Organization directors of site visit agencies are asked these questions during the planning calls. Applicable responses will be pre-populated for the questions answered in the pre-planning call.]]*

[Interviewer note: Complete table 4 based on the responses to the questions that follow the table. Do not directly ask the table 1 questions in the interview.]

I would like to learn more about the community members you serve. FNS will use the information from the following questions to improve data gathered for the FNS annual WIC Eligibility and Coverage Rates report. With these questions, we would like your input on how to assess the program's reach in [Tribal Organization] and whether that kind of information would be useful to you.

Table 4. Interviewer checklist (to be completed as participants respond to the discussion questions that follow)

Category	Response
Does the Tribal Organization limit WIC eligibility to individuals residing on or near Tribal lands?	☐ Yes ☐ No
What programs confer automatic income eligibility? (Note: Do not include Medicaid, SNAP, and TANF, which confer adjunctive income eligibility.)	☐ List here: ☐ None
Does the Tribal Organization have MOUs with other WIC State agencies?	☐ Yes, explain what the MOU covers: ☐ No

MOU = memorandum of understanding; SNAP = Supplemental Nutrition Assistance Program; TANF = Temporary Assistance for Needy Families; WIC = Special Supplemental Nutrition Program for Women, Infants, and Children

1. How does your agency define its service area?

   [Probes: individuals residing on Tribal lands or within the Tribal jurisdiction, individuals residing on the reservation, specific counties, specific ZIP Codes]

a. Does your service area align with the boundaries of your [Tribal lands/reservation]?

b. Would you be able to share a map of your service area?

2. From your State Plan, I understand that in addition to Medicaid, SNAP, and TANF, individuals can use proof of participation in the following programs to prove automatic income eligibility for WIC: [list programs from State Plan FAV III Question A4d]. Did I capture that correctly?

3. If someone isn't eligible to apply for WIC through your agency due to the established service area but could be eligible through a nearby WIC program, what do you tell them?

   [If needed, give this example: A person might not be eligible for WIC through the Mississippi Band of Choctaw Indians but could be directed to Mississippi WIC.]

4. To what extent are you able to reach everyone who is eligible for WIC?

5. Do you gather information to help understand the extent to which you are reaching potentially eligible women, infants, and children?

   [If yes]

   a. What data do you use? How do you use it?

      [Probes: Tribal records, IHS records, birth records]

      i. Would you be able to share these data with FNS or its research contractor for a future WIC eligibility estimates study?

      ii. What concerns do you have about sharing the data? Would any concerns be alleviated by sharing only aggregate-level data versus individual data (for example, number of children born versus a record for each child)?

6. We have heard that some State agencies establish memoranda of understanding with other WIC State or local agencies. Does [Tribal Organization] currently have an MOU with another State agency?

   [If yes]

   a. With which State agency(ies)? With which local agency(ies)?

      What is the purpose or intended goal of this/these MOU(s)?

      [Probes: to provide co-scheduled, overlapping, gap-reduction, or otherwise collaborative services]

   b. What is listed in the MOU for each agency's target number of individuals?

   c. What data did you use to establish the goals or limits stated in the MOU?

   d. How often do you review the data and revise the goals?

   e. How frequently do you renegotiate the MOU? Why would you renegotiate?

      [Probe for time limits, population shifts]

   f. Do you have any other informal agreements with other State or local agencies that address whom you will serve or how you will work together?

7. The WIC Eligibility and Program Reach report currently includes several measures of how well WIC programs reach eligible individuals in geographic states: coverage rate (percentage of the total eligible population that receives WIC benefits), eligibility rate (percentage of the total population in each participant category estimated to be eligible for WIC), and counts of participation. As FNS works to create measures of program reach specific to WIC Tribal Organizations, which of these, or other, measures would be meaningful to you?

8. What suggestions do you have to help us think through how to develop program reach measures for [Tribal Organization]?

   [Probes: data to use, specifics about your WIC population, overlap with other WIC State agencies]

[Interviewer note: Please show the respondent the following map (figure 1) and ask the next question.]

9. FNS's current WIC Eligibility and Program Reach report includes maps that display estimates for each geographic State agency. If we develop an appropriate reach metric for [Tribal Organization], would you like to see [Tribal Organization] included on a map in the report?

   a. [If no] That's perfectly reasonable. To help me understand, could you share your concerns about being included on a map?

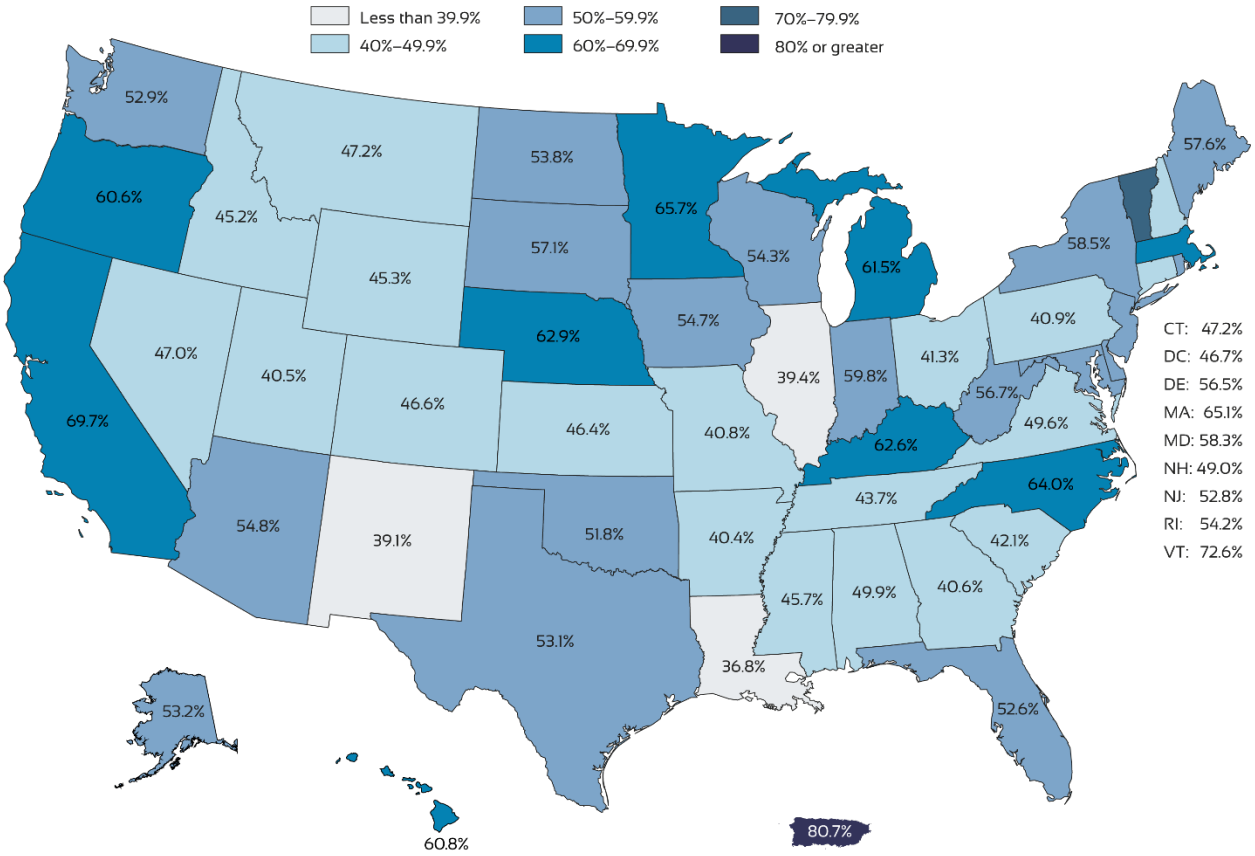
   [If yes]

   b. How would you like to see [Tribal Organization] represented on the map?

   c. Are there any other graphics or ways that you'd like to see [Tribal Organization]'s reach metrics represented? If yes, please describe.

   d. Do you have examples of maps that have done a good job of representing [Tribal Organization]?

Figure 1. WIC coverage rate for total eligible individuals by State: Calendar year 2022



B. Questions for All Tribal Organizations to Be Asked Under a Future WIC Eligibility Estimates Data Collection

The following questions are not included as part of the WIC Tribal Organizations and U.S. Territories Study and could be asked of all 32 WIC Tribal Organizations operating as State agencies under a future WIC Eligibility Estimates contract. To gather these data, the study team would request generic OMB clearance to conduct follow-up conversations with the Tribal Organizations to present our initial designs for the program reach metrics and gather their feedback.

Thank you for meeting with us today. You may remember that someone from our research team met with you [*number of months*] months ago to discuss considerations related to *[Tribal Organization]*'s program reach. We used the information you provided during that discussion to develop what we think would be a good way of determining how many individuals are eligible for WIC under *[Tribal Organization]* and how many of these individuals your program is reaching. Today, we'd like to review our initial thoughts and get your feedback.

1. According to the information you provided during the videoconference discussion, we think the following program reach metric may be best suited for *[Tribal Organization]*. *[Interviewer to insert specifics.]*
    a. What are your initial thoughts about this metric? Is it a helpful statistic for *[Tribal Organization]*?
    b. What would you change?
    c. How can we make this more useful for you?
    d. Anything else?
2. We are asking all Tribal Organizations that operate as State agencies if they would like their new program reach metric to be included in an upcoming WIC Eligibility and Program Reach report or in a standalone brief available only to your State agency. Please keep in mind that if you prefer having the brief provided only to *[Tribal Organization]*, this document would still be subject to requests under the Freedom of Information Act, or FOIA.
    a. Would you like your program reach metric to be included in either the annual report or a standalone brief? Or would you prefer not to have this estimate produced?
    b. If you prefer that we do not produce this estimate, can you explain your concerns?
    c. If you are interested in having the metric included in the report or a standalone brief, is there any additional information or context you would like to be included along with your program reach metric?
    d. If interested in a standalone brief, what other data would be helpful for us to include? *[Probe: national coverage rates, coverage rates by race and ethnicity, participant counts]*