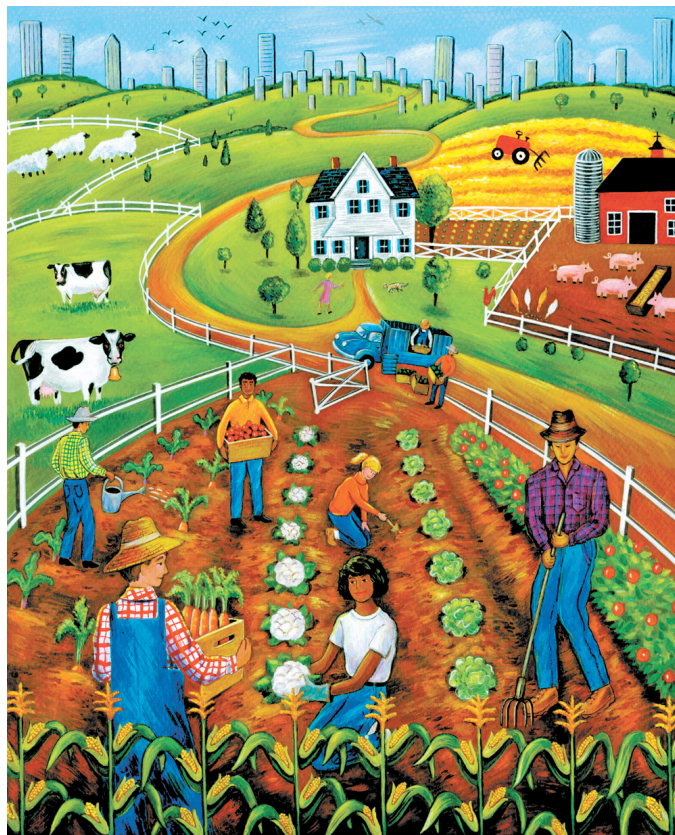


State Implementation of the New WIC Produce Package: Opportunities and Barriers for WIC Clients to Use Their Benefits at Farmers' Markets



Community Food Security Coalition

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Introduction

The report below provides an overview of the current status of the new WIC Package Rule [at 7 CFR 246.12(v)] and the issue of states authorizing farmers as vendors for the new cash value vouchers for fruits and vegetables. The first section provides a general background of the new interim final rule and its relationship with the Farmers' Market Nutrition Program (FMNP). The second section clarifies the differences between the new WIC Package cash value vouchers and the FMNP vouchers in order to provide context for the issues faced by state agencies in authorizing farmers as vendors for cash value vouchers. The next three sections provide an overview of survey data, barriers, and case examples collected from 36 states regarding their decision to authorize or not to authorize farmers as vendors for the new cash value fruit and vegetable vouchers. The final section includes policy recommendations.

The New WIC Package Rule: Background and Relationship with the Farmers' Market Nutrition Program

The interim final rule revising the WIC food packages was published in December of 2007, with individual state WIC agencies expected to phase in the changes by October 1st, 2009. The new rule updates the WIC food package to "align with 2005 Dietary Guidelines for Americans" and infant feeding practice guidelines of the American Academy of Pediatrics. The rule also reflects recommendations made in a 2005 report of the Institute of Medicine of the National Academies: "WIC Food Packages: Time for a Change," which proposed changes to the package that would "increase the participants' choices, improve the health and nutritional quality of the foods in the program, and expand cultural food options by offering fruits and vegetables, whole grain breads, and the option of soymilk and tofu" (FRAC, 2006).

One aspect of the new package with particular significance for community food systems and serving the health and needs of diverse communities, is the new fruit and vegetable vouchers. The new interim rule includes cash value vouchers or checks to be used to purchase fresh fruits and vegetables. The vouchers are to be distributed in amounts of \$6.00 (children), \$8.00 (women), or \$10.00 (breastfeeding women). The new interim rule also allows states to authorize farmers at farmers' markets or roadside stands to redeem the cash-value vouchers (CVV) for fruits and vegetables. This component of the rule provides a great opportunity for WIC participants to gain additional access to fresh fruits and vegetables, while also supporting local farmers and community food systems.

There is relevant research on the impact of providing WIC participants access to more fruits and vegetables available as a result of the Farmers' Market Nutrition Program (FMNP). The FMNP was established in 1992 in order "to provide fresh fruits and vegetables to WIC households, expand the awareness and use of farmers' markets, and increase sales at such markets" (California WIC Association, 2008). According to USDA's Food and Nutrition Service (FNS), 2.3 million WIC participants received FMNP benefits in 2008, with 16,016 farmers, 3,367 farmers' markets and 2,398 roadside stands authorized to accept FMNP coupons. These FMNP coupons led to approximately \$20 million in revenue for farmers in the 2008 fiscal year (USDA, 2009).

In an evaluation of the impact of FMNP, Washington state reported that WIC participants enhanced their knowledge and skills related to fruits and vegetables as well as reported an increase in their fruit and vegetable intake. Additionally, participants in WA's FMNP also reported that they planned to visit farmers' markets in the future (Year End Farmers Market Pilot Report, Washington State, 2006). Additionally, the California Department of Public Health notes that of every dollar spent on FMNP, 83 cents goes directly to the farmer selling the produce, who are in many cases women, minorities, and farmers running family owned and operated businesses (CDPH, 2009). Recognizing the valuable impact of FMNP on both the economic viability of local farmers as well as the fruit and vegetable consumption of WIC participants is especially relevant in considering the potential of authorizing farmers as vendors for CVVs.

When initial discussions began regarding the new WIC rule and allowing farmers as vendors for the cash value vouchers, many advocates were concerned that the cash value vouchers would replace the Farmers' Market Nutrition Program. In the interim rule, however, FNS clarifies that the regulatory requirements for FMNP would remain unchanged by the new rule. In fact, the successes of the FMNP, in terms of increasing participant access to fruits and vegetables, as well as individual state FMNP data on redemption rates, participant approval, and farmer impacts, provides justification and a model for states interested in including farmers as vendors for the new WIC package. Additionally, for those states currently participating in the FMNP, several sections of the new rule make reference to integrating the new WIC CVV process with the infrastructure already in place as a result of the FMNP (including state authorization, contracts and monitoring). See the following section for more information.

The Potential Impact of WIC Fruit and Vegetable Package on Farmers' Markets

Since its authorization as a national program in 1992, the FMNP has had a significant impact on access to fresh fruits and vegetables in many communities underserved by grocery stores. New York City is perhaps the most salient example of how this program has improved food access. Numerous farmers' markets in Brooklyn, Upper Manhattan, and the Bronx have sprouted up to capture the demand coming from the over \$1 million in FMNP vouchers annually distributed to low income women in these neighborhoods. FMNP has created the subsidy necessary for these markets to thrive, which in turn have improved access to healthy food for all residents, not just WIC users.

The amount of money flowing through the WIC program for fruits and vegetables dwarfs the FMNP's \$22.1 million distribution in 2007. While FMNP served 2,347,866 recipients in 2007, WIC reached more than three and a half times that amount: 8,285,249 persons. The typical FMNP allocation is \$20 or \$30 **per year**. WIC provides \$6-\$10 per month (\$72-\$120 annually) depending on whether the recipient is a child, infant, nursing mother or pregnant woman. An estimated \$500 million, or 25 times the amount of the FMNP allocation, will be available for fresh fruit and vegetable purchase through WIC every year. With this large a pool of money at stake, the potential impact on farmers' markets and consequently the improvements in food access in low-income communities is enormous. Even if only 3-4% of all fruits and vegetables purchased with WIC vouchers were redeemed at farmers' markets, it would match the Farmers' Market Nutrition Program buying power. However, it should be noted that there are significant

seasonal, cultural, educational, and logistical challenges for these coupons to be utilized at farmers' markets.

Cash Value Vouchers (CVV) vs. Farmers' Market Nutrition Program (FMNP) Vouchers

As individual states have begun to assess whether they will authorize farmers as vendors for the new CVVs, many state WIC agencies had questions about the similarities and differences between the FMNP and the new WIC package CVVs. On a basic level, the CVVs have the potential to serve a larger number of WIC participants. Broadly, the size of the CVV program compared with the FMNP has implications both for the capacity of WIC agencies to integrate farmers into their authorization structure, as well as additional implications for the capacity of farmers to serve a larger number of WIC recipients.

A separate issue in the context of this transition relates to states working on transitioning to EBT for WIC. Over the past several years FNS has made it a priority to expand WIC EBT programs across the country, providing states support in developing, planning, and implementing EBT systems for WIC. According to a FNS status report posted in May 2009, 14 states have conducted pilot or demonstration projects on WIC EBT with mixed results. Seven states had to terminate or discontinue after the completion of pilot as a result of resource issues and project costs (New England Multi-State Project, Ohio), and only two states (Wyoming and New Mexico) have WIC EBT operating statewide (WIC EBT Status Report, 2009). FNS expects to use these pilot and demonstration projects to address issues associated with financial sustainability of EBT for WIC as well as developing alternative technologies for EBT transactions. FNS is currently providing planning grant money to additional states (such as Virginia, Florida, Arkansas, and Wisconsin) related to WIC EBT activities. As more states continue to assess the feasibility of transitioning to EBT for WIC benefits, issues regarding training, technology, and cost will also influence WIC agencies' capacity and/or willingness to integrate farmers as vendors for the new CVVs (WIC EBT 5-Year Plan, 2006).

In order to provide additional context for considering agency and farmer capacity for the new WIC package, as well as additional barriers faced by states in allowing farmers as vendors for the cash value vouchers, here is an overview of differences:

	CVV	FMNP
When Issued	Monthly	Once/year during market season
When Accepted	Must be accepted in month issued	Anytime during the market season
Amount of Vouchers	\$6, \$ 8, or \$10 denominations	\$2 or \$4 for a total of \$10-\$30/ market season
Deposit Procedure	<ul style="list-style-type: none"> • Farmers to put assigned WIC # on all CVV (and in some states must electronically submit check serial number to state by telephone, the internet, or data file). • Check needs to be deposited within 45 days of the first date-to-use on check. • Farmer vulnerable to returned check charges if accepted outside timeframe 	<ul style="list-style-type: none"> • Deposit like a regular check (except in certain states) • Farmers can deposit checks anytime during the 7-month market season time-frame (by December 31st)
Customer Usage	<ul style="list-style-type: none"> • Participant must use voucher within 30-day period listed on vouchers • Participant must sign vouchers and present ID. • Farmers required to write in purchase price on all checks. 	<ul style="list-style-type: none"> • Participants may use check anytime during the market season. • No ID or signature required
Product Types	<ul style="list-style-type: none"> • No white potatoes, herbs, or squash blossoms • Inventory must be 50% or more grown by themselves. 	<ul style="list-style-type: none"> • Potatoes and herbs allowed. • No regulations on percentage grown by themselves, but produce must be locally grown.
Agreement with the State	Each individual farmer must have written agreement with the state agency.	<ul style="list-style-type: none"> • The farmers' market or farmer may enter into written agreement with the State. • States may enter in one agreement for both FMNP and WIC. Farmers in FMNP may be excluded from monitoring by WIC agency.
Training	Each farmer must attend or access training on regulations with WIC.	Minimal training required.

The Status of CVVs and State Authorization of Farmers as Vendors

Survey data collected from 36 states over three months (April-June 2009) reflected that:

- **Six states are piloting or implementing the CVV program including farmers in the 2009 market season** (New York, Ohio, Oklahoma, South Carolina, New Jersey, and Arizona).

- **Nine states are implementing or piloting in the 2010 market season** (California, D.C., Maine, Washington, Oregon, Maryland, Georgia, Iowa, and Massachusetts).
- **Four states are deciding in 2010** (Florida, North Carolina, Tennessee, and Minnesota).
- **Seventeen are not planning on allowing farmers at this time** (Alabama, Colorado, Illinois, Missouri, New Hampshire, Texas, Wisconsin, Vermont, Virginia, Nebraska, Idaho, Louisiana, Michigan, West Virginia, Kentucky, New Mexico, and Pennsylvania).

Common Barriers for States Not Planning on Allowing Farmers as Vendors

A few states were unique in terms of the structure of their WIC program (i.e. primarily rural, such as Vermont) or were not currently involved in the FMNP (or are in a limited capacity, such as Louisiana) and cited those characteristics as barriers for authorizing farmers as vendors. In general, however, there were several barriers repeatedly described by those states not planning on authorizing farmers as vendors for the new CVVs. The primary barriers noted include:

- **Limited resources, staff, and time to develop infrastructure for authorizing and training farmers to accept CVV**, while also working on releasing the new WIC package by October 2009.
 - Colorado, Florida, Idaho, Louisiana, Maryland, Missouri, and several other states highlighted limited resources and time as issues they considered when deciding not to allow farmers as vendors for the new package. Additionally, the majority of states choosing not to incorporate the farmer component noted that because of the level of changes to the WIC package, they wanted to focus primarily on implementing the new rules in their state before considering additional components.
- **Limitations because of EBT**. Most states have not transitioned to EBT for WIC benefits (primarily because of issues related to purchasing restrictions as well as technical and resource issues) and want to wait for EBT technology before making the transition.
 - Washington, Vermont, New Mexico, and Texas each mentioned that their decisions were limited by their states' current status regarding EBT. Both Texas and New Mexico in particular have moved forward with developing EBT technology for their individual WIC programs, but have not transitioned to EBT for all of their farmers' markets, limiting their ability to include farmers as vendors for the new WIC package.
- Concerns regarding the **limited number of established farmers' markets and the farmers' capacity** to provide sufficient amounts of food (and choices) for WIC participants.

- Alabama and Tennessee each mentioned the limited number of active farmers' markets in their state as a significant issue in their decision not to authorize farmers as vendors. Alabama specifically noted that they believed they would need more established farmers' markets with more available produce to make developing the necessary infrastructure worthwhile for both the participants and the farmers.
- **Concerns about farmers' market hours, location, and accessibility for WIC population.**
 - Both Florida and Alabama mentioned issues related to accessibility of markets for their WIC populations. Both states were concerned that WIC participants would have difficulty visiting markets during operating hours, as well as transporting themselves to markets often located in locations away from their neighborhoods.
- **Issues regarding CVV/check processing, differentiation of CVV and FMNP vouchers, farmer training, and farmer vulnerability to check return charges.** The majority of states vocalized concerns about processing issues related to the CVV versus the FMNP, and the additional burden placed on the farmer as a result of the way the new rule was written.
 - Additionally, several states, including California and Washington, mentioned concerns about the vulnerability of farmers to check return charges as well as bank specific charges for depositing a large number of checks.
- **The disconnect between the structures for FMNP and WIC CVV:** Some states run the programs together, in other states FMNP is run by Department of Agriculture (or equivalent) while WIC package remains with Department of Human Services (or equivalent). Those states that work with the agency running the FMNP in terms of the new CVVs have been more effective in addressing the barriers to allowing farmers as vendors than those states that do not coordinate between departments.

Successful Methods and Case Overviews

In terms of those states that are either currently conducting a pilot of the CVV program with farmers as authorized vendors, or are planning on starting the program in 2010, several contacts mentioned successful methods or techniques that eased their transition to authorizing farmers as vendors. These methods are listed as follows:

- **Formation of advisory groups, either broad scoping policy groups, such as food policy councils, or WIC specific retail or farmers groups who can inform the transition process.** More specifically, several contacts noted that coordination between Department of Agriculture and Departments of Public Health or Human Services were vital for making the transition possible.

- For example, New York's Food Policy Council has provided a forum for representatives from the Department of Agriculture and the Department of Health to coordinate their efforts in implementing the new WIC package and including farmers as vendors for the new CVVs.
- Oregon's WIC Program Vendor Manager convened an advisory group including farmers and local hunger advocates to examine the possibility of allowing farmers as vendors for the new vouchers. The group ended up supporting the WIC agencies proposal to postpone until 2010 to implement CVVs for farmers, but provided important support and collaboration
- **Development of state legislation and changes in administrative rules that includes input from local advisory groups, organizations, and vendors.**
 - For example, Ohio recently passed administrative rules that updated state rules to match the new Federal WIC Regulations. These changes were also supported by advisory groups or other local organizations that helped develop the state level legislation or consulted with state agencies regarding issues related to certifying farmers as vendors.
 - An advocacy organization in Texas has also taken steps to encourage state lawmakers in developing legislation that supports the creation of a feasibility study group on WIC and farmers' markets. Although Texas is not currently authorizing farmers as vendors for the new CVVs, advocacy organizations in Texas are active on the issue and the Texas WIC Program has been responsive and optimistic about future steps in the transition, including examining authorizing farmers as vendors when WIC EBT becomes available.
- **Creation of pilot programs in order to assess financial feasibility and participant use of farmers, farmers' markets, or roadside stands with the new WIC package.** Several of the states surveyed mentioned concerns regarding whether the amount of staff and time necessary for allowing farmers as vendors would be productive for both their agency priorities and the WIC participants. Pilot programs have the capacity to provide concerned states with justification for developing the necessary infrastructure and support for authorizing farmers as vendors.
 - California has concrete plans to conduct a pilot in two counties beginning in the market season of 2010. Florida also plans to conduct a pilot program in 2010, but has serious concerns about possible low redemption rates as a result of market locations and transportation as well as market hours of operation.

Three states in particular have been active in establishing active pilot programs either currently operating during the 2009 market season or beginning in 2010 that may help inform other states as they begin to implement the new package and work to integrate farmers as vendors for CVVs.

California

California is currently planning to roll out the cash value voucher program statewide beginning in early 2010. California is one of two states (the other being Pennsylvania) that uses a unique method for processing WIC checks that requires vendors to call in the check numbers of the redeemed vouchers to the WIC agency. The general structure of California's process, other than the check processing requirements, however, is relevant to other states looking to make the transition. California's objectives, as described by the California WIC Association (2009) include:

- Developing farmer training on banking processes, reviewing check-handling requirements, and preventing farmers from experiencing return-check charges.
- Developing a farmer authorization process and a process to allow farmers access to WIC's automated systems so they can report check serial numbers.
- Evaluate the cost, efficiency, and participant utilization to inform future program development.

New York

New York is the first state to allow authorized farmers to accept CVVs in the 2009 market season. As one of the biggest success stories for the FMNP, New York's WIC agency was comfortable adding the CVV to the structure of the FMNP. In New York, the FMNP is facilitated by the Department of Agriculture (which was designated by the state as a Vendor Management Agency in an MOU from 1988). This structure allows the Department of Agriculture to authorize and monitor farmers participating in the FMNP, and makes it possible to more easily integrate the new CVV system, called "monthly fruit and vegetable checks" in New York. Currently, however, the Department of Health is the lead agency for the new WIC package, which has decreased the flexibility of the Department of Agriculture in supporting the program and integrating the program into the FMNP structure. The Department of Agriculture is currently trying to address this issue by developing a new agreement with the Health Department, in order to allow Department of Agriculture to further integrate the new CVVs into their FMNP structure (both in terms of monitoring compliance and the farmer authorization process). The general structure of the first year pilot is described below:

- The Department of Agriculture sent a letter to authorized FMNP farmers, informing the farmers that they would be eligible for the new program, and explaining the differences between the CVV (or, in New York they are called "monthly fruit and vegetable checks"). Farmers were expected to complete a separate application for participation in the new fruit and vegetable check program, including the bank that they use, which is needed for Federal WIC oversight.
- Once the farmers completed the application for participation in the monthly program, they were expected to attend a workshop/training sponsored by the

Department of Agriculture. This training was done in conjunction with the training requirements for FMNP and focused on differentiating the programs for farmers, in order to reduce the risks for farmers participating in the program.

- In order to meet monitoring guidelines, the Department of Agriculture already conducts field inspections of the markets for the FMNP, including compliance buys to verify that farmers are complying with the program. The Department of Agriculture plans on integrating the required monitoring for the new CVV program with their current field inspections for the FMNP.
- Finally, New York's efforts on the new WIC package issues (and previously FMNP) were coordinated and supported by their food policy council that includes the Commissioner of Health and Commissioner of Agriculture, which has allowed for increased collaboration on FMNP and now the new WIC package and allowing farmers as vendors.

South Carolina

South Carolina is the only state in the Southeast Region authorizing farmers to accept CVVs during the 2009 market season. As an FMNP participant since 1994, South Carolina has a strong infrastructure in place for allowing farmers as vendors for the new CVVs, as well as valuable relationships with the Department of Agriculture, grassroots organizations, and farmers. These relationships, along with administrative resources in the Division of WIC Services, has made developing the training and support necessary for integrating the new vouchers into the system a painless process. A general overview of the South Carolina's structure is described below:

- South Carolina used the FMNP structure that was already in place to develop the process for allowing farmers as vendors for the new vouchers. Farmers who are eligible to accept FMNP checks are automatically eligible to accept WIC CVV.
- Those farmers that chose to participate in the new CVV component were required to attend a face-to-face training in order to become authorized. The training was conducted by South Carolina's WIC Division, the South Carolina Department of Agriculture, and the South Carolina Department of Social Services (Senior FMNP Agency).
- At the training, the coordinating state agencies presented slides on the new CVVs as well as provided a packet of materials detailing the differences (such as the different types of foods allowed by each type of check as well as processing and depositing expectations) between the FMNP checks and CVVs. This prepared farmers for the differences between the two types of checks.
- During the training, the Division of WIC Services also addressed farmer concerns about the new program, which included issues related to differentiating which foods were eligible to be purchased by the different types of checks (i.e. FMNP=South Carolina grown-only, CVV=Any fresh produce-except white potatoes).

- South Carolina currently reports that the planning, training, and implementation process has gone very smoothly. The Division of WIC services works very closely with the State Department of Agriculture, which is supported by several grassroots organizations focused on establishing new markets in underserved areas, as well as pursuing SNAP EBT for markets around the state.

Recommendations

Federal policy

Food and Nutrition Service should consider the following:

- **Modify WIC regulations to allow states to use the same vendor-related structures as FMNP.** Amending the regulations would address many of the barriers highlighted by individual states concerned about the resources required to develop a new system for incorporating farmers as vendors, as well as more efficiently use staff and resources already available at individual state agencies operating FMNP.
- **Provide exceptions for farmers' markets accepting CVV to match FMNP regulations, such as authorizing markets instead of vendors and removing barriers around CVV redemption and depositing.** This would not only improve the capacity for state agencies to integrate the new CVV process into currently functioning FMNP structures, but it would also encourage increased participation of both states and the farmers by simplifying the differences between CVV and FMNP vouchers. Providing exceptions would also address concerns regarding the financial vulnerability for the farmers accepting and depositing CVV.
- **Plan pro-actively for farmers' markets in rollout of EBT for the WIC program.** As more states look to transition to EBT for WIC, it will be important to consider how these efforts could be coordinated with the ongoing state efforts towards SNAP EBT. Developing an action plan for coordinating WIC EBT with SNAP EBT early in the process could prevent the need for duplication of resources, research, and planning in future years.
- **Encourage states to allow farmers' markets as vendors when implementing new WIC rules.** It is clear that individual states could decide whether to include farmers as vendors contingent on their individual staff and resource capacities. However, states do not fully understand the similarities and differences between CVV and FMNP, as well as the capacity to use the already existing FMNP structures. As a result, many states have perceived the transition to allowing farmers as vendors for the new CVVs as an additional burden.
- **Explore ways in which WIC clients not participating in the FMNP can receive similar education and information about farmers' markets.** This could include providing encouraging state WIC agencies to collaborate with the individuals

coordinating the FMNP program, in order to share materials and best practices for educating WIC participants about farmers' markets.

- **Explore the connections between the use of SNAP, WIC, FMNP and SFMNP benefits at farmers' markets to maximize coordination and synergies, in context of the forthcoming ERS report on food deserts.** A greater level of coordination between these different benefits (and the divisions of FNS coordinating these benefits) will make it possible for agencies to coordinate strategies and resources to promote local healthy food for low income individuals.
- **Explore the long-term integration of FMNP and the WIC program with the aim of increasing the total dollar value of federal funds flowing to farmers' markets.** Two separate programs with similar goals and different regulations is not a viable long-term strategy to connect WIC clients with farmers' markets. Given the lack of administrative funds associated with FMNP, many local or state WIC administrators may choose to drop the FMNP program in favor of the CVVs, which have a much larger buying power attached to them. USDA needs to develop a way to link these two programs that allows for program streamlining, while guaranteeing farmers' markets a revenue stream baseline and room for growth.

Individual State WIC Agencies

- **Explore ways in which WIC clients not participating in the FMNP can receive similar education and information about farmers' markets.** Depending on the individual state, WIC agencies should collaborate with either the individual/agency facilitating the FMNP program in their state to share materials and best practices for educating WIC participants about farmers' markets. States should also develop relationships with advocacy organizations or their local Farmers' Market Association in order to inform themselves of farmer concerns and market structure in order to better meet the needs of the WIC participants.
- **Facilitate CVV training for farmers and/or market operators to fit into their schedules and geographical dispersion.** Although individual states are responsible for developing trainings for the new CVVs, FNS may encourage states to develop trainings that decrease barriers for farmers. Additionally, individual states can consider working with farmers and other vendors in the planning process for incorporating CVVs, in order to develop materials and trainings that best meet the needs and concerns of farmers, as well as establish buy-in from the farming and farmers' market community.

Funding community

- **Support peer-to-peer education efforts through conference calls, one-on-one mentoring, workshops at relevant conferences, resource guides, and a centralized information clearinghouse.** National non-profit organizations can

facilitate information sharing to encourage cooperation between state agencies. This approach will help states to learn from their peers in leading states, and to identify strategies for overcoming barriers.

- **Support state-by-state efforts to gain inclusion of farmers' markets in WIC program, especially through administrative advocacy by NGO leaders, and the creation of advisory committees and food policy councils.** Many states need to hear from the public that farmers' markets are a priority vendor for the WIC program. Advocacy groups can help mobilize the public to communicate this message, as well as to work with WIC agencies to develop solutions collaboratively.
- **Support a learning community or informal network of organizations focused on enhancing the patronage of farmers' markets by federal nutrition program users, including sharing information on media campaigns and incentive efforts for WIC participants to shop at farmers' markets.** Across the country, activists are engaging in efforts to make healthy locally-produced food available and affordable for federal nutrition program users, such as SNAP and WIC recipients. These burgeoning efforts are not organized, nor is there adequate communication amongst them that would enable shared learning. Such a loosely affiliated network, perhaps connected through a listserve, blogs, or other electronic media would allow groups to avoid re-inventing the wheel.

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Appendix 1:

**New WIC Rules and Farmers' Markets
State Survey Data
As of June 22nd, 2009**

	State Contact Info	Farmer CVV Status	Successes and Barriers
1	Alabama Don Wambles Administrator Alabama Farmers Market Authority	No	<ul style="list-style-type: none"> • Capacity of farmers and farmers markets to grow enough food for WIC participants. • Concerns regarding sustained use of markets by participants (if markets are in competition with grocery stores). • Concerns regarding the length of the growing season and fruit and vegetable access.
2	Arizona: Cindy Gentry Community Food Connections Karen Sell Arizona Dept. of Health	Yes	<ul style="list-style-type: none"> • No additional information provided.
3	California Laurie True California WIC Association	2010	<ul style="list-style-type: none"> • Developing necessary training, infrastructure, etc. to support both farmers while also working within the current banking structure. • Concerns with burden placed on farmer in terms of processing and depositing checks. • Concerns with differences between CVV and FMNP vouchers (and additional rules tied to CVVs). • Believes that the rule should be rewritten.
4	Colorado Cheryl Cassell Retail Coordinator	No	<ul style="list-style-type: none"> • Concerns regarding WIC program capacity and resources. • Lacks infrastructure from FMNP. • Concerns regarding vendor authorization and compliance requirements. • Decision impacted by the short implementation timeline.
5	District of Columbia Gloria Clark DC WIC Program	2010	<ul style="list-style-type: none"> • Has not fully researched issue at this point, although is planning on conducting a training before 2010 market season. • Strong relationship with farmer cooperative groups in D.C. as well as Mayors Commission on Food, Nutrition, and Health (no Department of Agriculture in D.C.). • Interested in learning more about the experiences of other states (as that has been helpful regarding other components of the new WIC package.)

6	Florida Debbie Eibeck Chief Bureau of WIC and Nutritional Services	Deciding in 2010	<ul style="list-style-type: none"> • Focusing on implementing the new package. • Concerns regarding viability and sustainability of farmers markets (as well as market capacity to be accessible to WIC participants). • Concerns with operating hours and locations of farmers markets. • Interested in the idea of farm to store as a way of addressing the access issues that may arise for WIC participants using farmers markets.
7	Georgia Doris Gates FMNP Manager	2010	<ul style="list-style-type: none"> • Have already completed new contracts with farmers for new WIC package and will prepare a FMNP and CVV training for farmers in the winter of 2010. • Convened an advisory council for work on the new package that has contributed to discussions on CVVs and farmers.
8	Idaho Kathy Gardner Idaho Hunger Task Force Kristina Spain Idaho WIC	No	<ul style="list-style-type: none"> • Decision impacted primarily by lack of staff and resources to develop a new infrastructure for allowing farmers as vendors for CVVS.
9	Illinois Penny Roth Actin Chief Bureau of Family Nutrition Steve Strode WIC Vendor Management	No	<ul style="list-style-type: none"> • Decision impacted by having separate contracts for FMNP and WIC (less coordination between Department of Ag and Bureau of Family Nutrition). • Prioritizing implementing the new package first.
10	Iowa Judy Solberg Chief Bureau of Nutrition and Health Promotion	2010	<ul style="list-style-type: none"> • Planning on conducting joint FMNP/CVV training for farmers facilitated by the WIC vendor coordinator, WIC nutritionist, and two Department of Agriculture employees in Winter 2010.
11	Kentucky Fran Hawkins Manager Nutrition Services Branch	No	<ul style="list-style-type: none"> • Currently has FMNP and alluded to possibility of CVV as duplication. • Decision impacted by administrative constraints, as well as concerns regarding increased training and monitoring. • Also has concerns regarding the short length of the market season

12	Louisiana Sheila White WIC Training Coordinator	No	<ul style="list-style-type: none"> • Decision impacted primarily by lack of staff and resources to develop a new infrastructure for allowing farmers as vendors for CVVS. • Additional concerns about CVVs because of a poor FMNP check redemption rate. • Prioritizing implementing the new package first. • Interested in reconsidering CVVs after transition to EBT for WIC.
13	Maine Kayla Colby Vendor Management	2010	<ul style="list-style-type: none"> • Prioritizing implementing the new package first. • Concerns about differences between food lists (CVVs and FMNP) and especially the white potato exclusion for CVVs. Northern Maine produces white potatoes. • Strong relationship and support from the Department of Agriculture regarding this issue, as well as contact with immigrant and organic farmer organizations. • Some general concerns regarding additional farmer training, although farmers were excited about program and willing to work with agency on issues.
14	Maryland James Butler Vendor and Operations Program Support	2010	<ul style="list-style-type: none"> • Prioritizing implementing the new package first. • Concerns regarding lack of time and resources to develop a new infrastructure for allowing farmers as vendors for CVVS.
15	Massachusetts Lisa Damon Massachusetts Department of Agricultural Resources	2010	<ul style="list-style-type: none"> • Prioritizing implementing the new package first, and watching what other states do. • Convening a group of farmers to discuss new program and address concerns. • Unique processing system that could be difficult with new vouchers. • Concerns regarding differences between FMNP and CVVs, and possible negative consequences (if not enough training) or not enough financial incentive for farmer participation. • Strong relationship between Department of Agriculture and WIC agency.
16	Michigan Karla Stratton Project FRESH Coordinator MDCH WIC Division	No	<ul style="list-style-type: none"> • Primary concern is that Michigan has rolled out WIC EBT statewide and most farmers markets are not ready for this option (do not have necessary technology).
17	Minnesota Betsy Clark WIC Director Carol Milligan FMNP Director	Deciding 2010	<ul style="list-style-type: none"> • Prioritizing implementing the new package first. • Concerned about effectively training farmers for new process. • Wanted to leave enough time for policy development.

18	<p>Missouri Eileen Nichols MO Farmers' Market Association</p> <p>Rhonda Perry Missouri Rural Crisis Center</p> <p>Randy Walton Department of Health and Senior Services</p>	No	<ul style="list-style-type: none"> • Decision impacted primarily by lack of budgetary resources. • Also believed that CVVS represent a small portion of client benefits.
19	<p>Nebraska Peggy Trouba WIC Director</p>	No	<ul style="list-style-type: none"> • No additional information provided.
20	<p>New Hampshire Margaret Murphy Nutrition and Health Promotion Section</p>	No	<ul style="list-style-type: none"> • No additional information provided.
21	<p>New Jersey Jean Malloy WIC Director</p> <p>Dorothy Ngumezi FMNP Director</p>	Yes: 2009 (October 1)	<ul style="list-style-type: none"> • Updated vendor agreement to reflect new CVV issues and provided mandatory training on CVVs to farmers.
22	<p>New Mexico Carol Byers-Garcia Nutritionist Trainer Food Management New Mexico WIC</p>	No	<ul style="list-style-type: none"> • Concerns regarding transition to EBT: All WIC in New Mexico is EBT-ready, but farmers' markets are not currently equipped for EBT in New Mexico. • Additional concerns include limited resources and staff available for developing training materials, farmers' market vendor agreements, farmers' vending training manuals.
23	<p>New York Bob Lewis</p> <p>Jonathan Thomson FMNP Manager</p>	Yes: 2009 Market Season	<ul style="list-style-type: none"> • Integrated CVV processing and authorization of farmers as vendors with FMNP structure. • Provided trainings to farmers to clarified differences between FMNP and CVV and addressed concerns of farmers. • Concerns regarding training expectations for CVVs, as well as monitoring if the

			<p>program remains with Department of Health.</p> <ul style="list-style-type: none"> Strong relationship between Department of Agriculture and Department of Health as a result of the Food Policy Council.
24	North Carolina Alice Lenihan State Public Health Agency	Deciding 2010	<ul style="list-style-type: none"> Prioritizing implementing the new package first. Want more experience with the CVV before incorporating farmers as vendors.
25	Ohio Kadie Donahue Ohio WIC Program	2009	<ul style="list-style-type: none"> Develop a system to track farmer application requests. Developed administrative rules regarding farmer participation as vendors for CVVs (and consulted with advocacy organizations and farmers regarding how the rules were written).
26	Oklahoma Justin Whitmore, Oklahoma Department of Agriculture	Yes: 2009 Market Season	<ul style="list-style-type: none"> No additional information provided.
27	Oregon Sharon Thornberry Oregon Food Bank Susan Woodbury Oregon WIC Program Maria Menor WIC Vendor Management Services	2010	<ul style="list-style-type: none"> Convened an advisory group that included hunger advocates and farmers to advise the Oregon WIC Program on the new package, including allowing farmers as vendors for CVVs. Strong relationship with the Department of Agriculture. Decided to prioritize implementation of new package, and include farmer component next year. Interested in conference calls and training materials.
28	Pennsylvania Greg Landis WIC Director	No	<ul style="list-style-type: none"> Concerns regarding unique state structure (like California) and additional difficulties with check processing and depositing by farmers. Concerns regarding the differences between FMNP and CVVs. Concerns regarding a lack of resources for the necessary training effort for farmers as vendors for CVVs.
29	South Carolina Beth Mullins Division of WIC Services	Yes: 2009 Market Season	<ul style="list-style-type: none"> Integrated new CVVs and authorizing farmers as vendors with FMNP structure. Farmers were required to attend a face-to-face training where they were provided materials and support for differentiating CVVs from FMNP checks. Strong relationship with farmers and Department of Agriculture eased the process.
30	Tennessee	Deciding 2010	<ul style="list-style-type: none"> Concerns regarding limited established farmers markets (and available produce and

	Peggy Lewis Supplemental Nutrition Program Director		<p>accessibility for WIC participants).</p> <ul style="list-style-type: none"> Concerns regarding the growing season (and losing participation during the off-market season).
31	<p>Texas Celia Hagert Center for Public Policy Priorities</p> <p>Andrew Smiley Sustainable Food Center</p>	No	<ul style="list-style-type: none"> Developed a working group to examine the new WIC package, including allow farmers as vendors. Advocacy organization supported efforts of state lawmakers to develop legislation that would create a pilot study of allowing markets to process CVVs. State agency making it a goal to implement as soon as possible after transition to EBT.
32	<p>Vermont Mary Carlson WIC Farmers Market Program Coordinator</p> <p>Dorigen Keeney Vermont Campaign to End Childhood</p> <p>Donna Bister WIC Program Director</p>	No	<ul style="list-style-type: none"> Concerns because of limitations as a result of state characteristics (primarily rural). Concerns regarding differences between FMNP and CVVs and impacts on farmers.
33	<p>Virginia Sheila Brewer Virginia Department of Health</p>	No	<ul style="list-style-type: none"> Concerns because FMNP is not statewide and they have limited administrative funds to expand the program. Decision impacted by wanting to maximize the dollar spent on fresh fruit and/or canned fruits and vegetables. Concerns regarding the differences between CVVs and FMNP checks, and training for the farmers.
34	<p>Washington Sandy Cruz FMNP</p> <p>Cathy Franklin Department of Health</p>	2010	<ul style="list-style-type: none"> Concerns regarding the differences between CVVs and FMNP checks, and the additional burden on farmers in terms of the CVVs. Concerns regarding check processing and depositing issues for farmers. Planning on integrating CVVs into the training they conduct with market managers in January and February. Interested in integrating it with EBT, but Washington does not currently have enough resources for WIC EBT. Interested in looking at rewriting the rules to lift barriers and make CVVs more closely aligned with FMNP.

35	West Virginia Denise Ferris WV Department of Health and Human Services	No	<ul style="list-style-type: none"> • Concerns include the differences between the two food lists (CVVs and FMNPs), as well farmers' abilities to meet the demand of WIC participants. • Additional concerns may arise when they begin looking at WIC EBT. • Would actually like FMNP food list to be more flexible/less stringent about locally and regionally grown products.
36	Wisconsin Judy Allen FMNP Director	No	<ul style="list-style-type: none"> • Prioritizing implementing the new package first (waiting to see what other states do). • Concerns regarding not being able limit the eligible foods to locally grown foods. • Concerns regarding differences between CVV and FMNP. • Would like to see the rule rewritten to lift barriers for farmers.