

Appendix A.4
WIC State Agency Semi-Structured Interview Instrument

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Thanks for taking the time to talk with me today. As part of this study, we are talking to WIC directors or other senior WIC staff at WIC State agencies about the strategies they use to contain food package costs. [In 12 EBT States only: We're also looking at EBT transaction data, certification records, and administrative cost data, and surveying WIC participants in 12 States with WIC EBT systems.] This study is intended to assess the effectiveness of various practices and will provide data to help FNS and State agencies make informed decisions about cost-containment efforts.

We are particularly interested in collecting information on three types of cost-containment practices. The first is food-item restrictions, which are considered to be restrictions on the brand, size, form, or content of foods authorized for purchase with WIC benefits. The second is manufacturer rebates on foods other than infant formula, and the third is limits on the number of authorized vendors. However, we would also like to hear about other practices.

I would like to record this call to supplement my notes, but anything you say will be kept private. We will not provide transcripts to FNS, use attributed quotes in our report, or otherwise identify individual respondents. Would it be OK with you if I recorded this conversation?

Do you have any questions before we begin?

A. Confirm Information Gathered From Food Lists, State Plans, and Policy Documents

Before setting up this interview, we reviewed your agency's State plan and food list. We extracted information about the foods you authorize to participants, your rebate policies, and your vendor policies and compiled it into one document. I'd like to start our conversation today by reviewing that document together to make sure the information is correct.

[Interview discusses information summary of WIC State agency cost-containment practices.]

B. General Cost-Containment Policies

Next, I'd like to ask some general questions about what your State agency is doing to contain WIC food package costs. We are particularly interested in effective cost-containment policies, and by "effective," I

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-XXXX. The time required to complete this information collection is estimated to average 45 minutes per response for the 78 WIC SAs, and 50 minutes per response for the 12 WIC EBT SAs, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

mean policies that contain food costs with minimal increases to administrative cost and with little or no

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adverse effects on program goals such as participation, access to vendors, participant satisfaction, and consumption of WIC foods. Please feel free to think broadly. This doesn't need to be limited to the food-item restrictions, rebates, and vendor restrictions we just discussed.

1. What do you think are the most effective cost-containment practices your State agency uses? I'm looking for your perceptions here. (*PROBE: (1) How effective are these practices in containing costs; (2) how effective are these practices in minimizing adverse effects?*)
2. How did you decide to implement those practices (*PROBE: Method? Rationale?*)
3. How long have your current practices been in place? Are you considering changing any of your practices?
4. Have there been any challenges associated with those practices?
5. What other practices have you considered? Why did you decide against implementing those practices?
6. Do you track the administrative costs associated with your practices? What contributes to the costs?
7. How do you evaluate the effectiveness of your cost-containment practices?
8. In general, what factors do you feel are important for your State agency to consider when evaluating a cost-containment practice? (*PROBE: Industry or political pressure?*)
9. Does your State agency have a smartphone app to help participants identify allowed foods?
10. **[If currently an EBT State agency]** Did moving to EBT change the way you contain costs?
11. **[If not currently an EBT State agency]** Do you anticipate making any changes to your cost-containment practices when you transition to EBT?
12. **[If currently in the process of implementing EBT]** How is the transition to EBT affecting your cost-containment practices?

C. Rebates

For State agencies with a rebate policy—

I understand your State agency has a contract in place to receive rebates for [*SPECIFIC FOOD(S) INSERTED HERE*] in addition to infant formula. I'd like to ask a few questions about that next:

13. How long have you had this rebate contract in place?
14. Do you participate in this contract as part of an alliance with other State agencies?
15. What process did you use to get this contract? (*PROBE: Competitive RFP? Political climate?*)
16. What are the administrative activities associated with rebates for [*FOOD X*] related to getting the contract in the first place and managing the rebates? How easy or burdensome is managing rebates?
17. What sort of feedback do you receive about [*FOOD X*] from vendors? Do they have any trouble stocking this item?

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18. What sort of feedback do you receive about [FOOD X] from participants? Would they prefer more choices or a different brand?
19. Do you think the rebates are successful in containing food package costs?
20. Do you plan to continue using rebate contracts for [FOOD X]?
21. Have you considered using contracts for any other foods? Why or why not?

For State agencies without a rebate policy—

I understand your State agency does not have any contracts in place to receive rebates for foods other than infant formula. I'd like to ask a few questions about that next.

22. Have you had rebate contracts in the past? If so, why did you stop using them?
23. Have you considered using rebates to control costs? Why did you decide against using rebate contracts? (*PROBE: Sufficiently competitive environment?*)
24. Are you considering using rebates in the future? If so, for what foods?

D. Vendor Restrictions

We understand that some State agencies have limits on the number of retailers, or vendors, they can authorize. My next few questions will be about vendor restrictions:

25. Does your State agency have a limit on the number of vendors that can be authorized?
26. Does your State agency have stocking requirements other than the minimums specified by FNS?
27. Other than numerical limits or ratios, are there other ways you limit the number or types of vendors that are authorized, or encourage certain types of vendors? (*PROBE: Strict stocking requirements? Moratorium on certain types of vendors?*)

For State agencies with vendor limits—

28. What is your vendor limit? (*PROBE: A set number? Vendor/participant ratio? Vendor/local agency ratio? Vendors/geographic area?*)
29. How many authorized vendors do you have now? [***If limit is a ratio:***] What is your current vendor/participant ratio? Did you deny any applications last year? If so, were any of those denials because of numeric limits?
30. ***For State agencies with nonbinding limits*** (e.g., a State agency with a higher vendor limit than its current number of vendors; State agencies that do not deny applications because of limits): Have you considered lowering the limit to something closer to the number of authorized vendors? If so, why haven't you lowered the limit?
31. ***For State agencies with binding limits*** (e.g., State agencies with number/ratio of vendors = limit; State agencies that deny applications because of limits) Are there administrative cost savings from limiting the number of vendors?
32. Do you authorize A-50 vendors? (i.e., vendors from which 50 percent or more of their food sales or revenue from food sales come from WIC transactions)

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- If not, why not? Do you plan to authorize any in the future?
 - Are there any statutory regulations that require you or prohibit you from authorizing A-50 vendors?
 - Do vendor restrictions differ for A-50 versus regular vendors? That is, do A-50 vendors count toward the vendor limit in the same way any other vendor would?
33. Why does your State agency limit the number of vendors? Does it reduce administrative costs of overseeing and monitoring vendors? Are there other reasons for limiting the number of vendors?
34. What sort of effects do limits on the number of vendors have on participants?

E. Food Item Restrictions

The next several sets of questions will be about the restrictions your State agency places on certain food items.

1. Least Expensive Brand

For State agencies with least expensive brand (LEB) policies—

I'll start with a few questions about your LEB policies. As we discussed earlier, you require participants to purchase the LEB of [SPECIFIC FOODS INSERTED HERE].

35. LEB is defined differently in different States. How does your WIC State agency define LEB? (*PROBES: By store or chain; frequency of determination; LEB available (e.g., if you are out of stock); on the EBT card/food app; etc.?*)
36. What responsibilities do vendors have to identify the LEB for participants?
37. How does your State agency train vendors to identify during checkout whether the selected products meet the LEB requirement? (*PROBE: Can participants purchase foods other than the LEB? What happens if the store allows participants to purchase foods other than the LEB?*)
38. How do you train participants to identify the LEB?
39. Do you think LEB policies are effective at containing food package costs?
40. What challenges has your State agency faced with implementing and maintaining LEB practices?
41. Have you considered using LEB policies for other foods? If so, what foods, and why did you decide against implementing LEB requirements?
42. What are the administrative activities associated with LEB policies? Do you track administrative costs? How easy or burdensome is it to manage LEB policies?
43. What feedback do you receive from vendors about LEB policies? (*PROBE: Administrative burden?*)
44. What feedback do you receive from participants about LEB policies? (*PROBE: Trouble identifying WIC foods? Dissatisfaction with brands?*)
45. What feedback do you receive from local agencies about LEB policies? (*PROBE: Burden to train participants?*)

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For State agencies without LEB policies—

Some State agencies require participants to purchase the LEB of certain foods. I understand your State agency doesn't have any LEB requirements, but I'd like to ask a few questions about that decision:

46. Has your State agency ever had LEB requirements in the past? If so, for what foods? Why did your State agency stop using LEB requirements?
47. Have you considered implementing LEB requirements? If so, why did you decide against them? If not, why have you never considered them? (*PROBE: Administrative burden? Characteristics of the WIC population? Characteristics of the State agency? Characteristics of vendors?*)
48. What administrative challenges or costs would you face if you implemented LEB requirements?
49. What challenges do you think vendors and participants in your State agency would face if you implemented LEB requirements?

2. Store Brand Only

For State agencies with store-brand-only policies—

Next, I have a few questions about your store-brand-only policies. As we discussed earlier, you require participants to purchase the store brand only of [SPECIFIC FOODS INSERTED HERE]:

50. How do you train participants to identify the store brand?
51. What accommodations do you make for small vendors who may not have a store brand?
52. What do vendors do if they run out of the store brand of a WIC food?
53. What administrative activities and costs are associated with store-brand-only policies? Do you track the administrative costs? How easy or burdensome is it to manage store-brand-only policies?
54. What feedback do you receive from vendors about store-brand-only policies? (*PROBE: Administrative burden? Trouble stocking store brands?*)
55. What feedback do you receive from participants about store-brand-only policies? (*PROBE: Dissatisfaction with brands?*)
56. What feedback do you receive from local agencies about store-brand-only policies?
57. What challenges has your State agency faced with implementing and maintaining store-brand-only policies?
58. Have you considered using store-brand-only policies for other foods? If so, for what foods, and why did you decide against implementing store-brand-only requirements?
59. Do you think store-brand-only policies are effective at containing food package costs?
 - Are store brands consistently lower cost than other brands?

For State agencies without store-brand-only policies—

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Some State agencies require participants to purchase the store brands of certain foods. I understand your State agency doesn't have any store-brand-only requirements, but I'd like to ask a few questions about that decision:

- 60. Has your State agency ever had store-brand-only requirements in the past? If so, for what foods? Why did your State agency stop using store-brand-only requirements?
- 61. Have you considered implementing store-brand-only requirements? If so, why did you decide against them? If not, why have you never considered them? (*PROBE: Administrative burden? Characteristics of the WIC population? Characteristics of the State agency? Characteristics of vendors?*)
- 62. What challenges do you think vendors and participants in your State agency would face if you implemented store-brand-only requirements?

3. National Brands

The next section asks a few questions about national brands. Your State agency's food list specifies certain national brands that participants can purchase in several food categories:

- 63. How do you select the brands that you allow? What criteria do you use?
- 64. Is cost containment a factor in decisions about which brands to allow? To what extent? And for which foods?
- 65. What are the administrative activities associated with national brand foods on your food list? Do you keep track of administrative costs associated with these activities? How easy or burdensome is it to authorize these national brands?
- 66. What feedback do you receive from vendors about the national brands on your food list?
- 67. What feedback do you receive from participants about the national brands on your food list?
- 68. What feedback do you receive from local agencies about the national brands on your food list?
- 69. Is limiting national brands an effective cost-containment practice?

For State agencies with no national brands (Virginia)—

- 70. Why did you decide against using any national brands?
- 71. Have you considered including national brands? Why or why not? For what foods?

4. Container-Size Restrictions

The next few questions are about container-size restrictions. Some State agencies restrict participants to larger size items with the goal of having them pay a lower amount per ounce. For example, some State agencies restrict participants to gallons of milk rather than allowing them to buy half-gallons. Your State agency has container-size restrictions for [SPECIFIC FOODS INSERTED HERE]:

- 72. Were all these size restrictions implemented for cost-containment purposes, or were there other reasons for restricting sizes?
- 73. Do any smaller vendors have difficulty stocking the appropriate container sizes? Do you relax any minimum stocking requirements to include smaller vendors in more remote areas?

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74. What feedback do you receive from vendors about container-size restrictions? (*PROBE: Trouble stocking required sizes?*)
75. What feedback do you receive from participants about container-size restrictions? (*PROBE: Preferences for other container sizes? Trouble consuming entire contents of a large container? What about lost ounces when sizes are unavailable?*)
76. What feedback do you receive from local agencies about container-size restrictions?
77. What are the administrative activities associated with container-size restriction policies? Do you track the costs of those activities? How easy or burdensome is managing container-size restrictions?
78. Some State agencies require a minimum package size of [SPECIFIC FOODS INSERTED HERE], but your State agency does not.
 - Why don't you require a minimum package size for those foods? Have you considered such a requirement?
79. Has your State agency considered implementing size restrictions for other foods? If so, why did you decide against them?
80. Do you think container-size restrictions are effective at containing food package costs?

5. Restrictions on Form and Type

Next, I'm going to ask a few questions about restrictions on the form and type of allowed foods. **Form** refers to the way food is delivered; for example, shredded, sliced, or string cheese. **Type** refers to different varieties; for example, Colby, cheddar, or mozzarella cheese. Your State agency has form restrictions for these foods [SPECIFIC FOODS INSERTED HERE] and type restrictions for these foods [SPECIFIC FOODS INSERTED HERE]:

81. Were these form and type restrictions implemented for cost-containment purposes, or were there other reasons for these restrictions?
82. Do any smaller vendors have difficulty stocking the appropriate forms and types?
83. What are the administrative activities associated with form and type restriction policies? Do you track the costs of those activities? How easy or burdensome is it to manage form and type restrictions?
84. What feedback do you receive from vendors about form and type restrictions?
85. What feedback do you receive from participants about form and type restrictions?
86. What feedback do you receive from local agencies about form and type restrictions?
87. Some State agencies restrict the form of [SPECIFIC FOODS INSERTED HERE] and the type of [SPECIFIC FOODS INSERTED HERE], but your State agency does not:
 - Why don't you restrict form and type for those foods?
 - Have you considered such a requirement?
88. Has your State agency considered implementing form or type restrictions for other foods? If so, why did you decide against them?
89. Do you think form and type restrictions are effective at containing food package costs?

6. Alternative Foods

The next topic is alternative foods. WIC regulations permit State agencies latitude in allowing some foods for their participants. For instance, some State agencies do not allow canned beans, and most State agencies allow only some of the whole-grain alternatives. First, let me review the alternatives allowed by your State agency:

90. Your milk alternatives are [SPECIFIC FOODS INSERTED HERE], but you do not allow [SPECIFIC FOODS INSERTED HERE].
91. You [do/do not] allow canned beans.
92. With regard to canned fish, you allow [SPECIFIC FOODS INSERTED HERE] but not [SPECIFIC FOODS INSERTED HERE].
93. There are six whole-grain bread alternatives. Your State agency allows [SPECIFIC FOODS INSERTED HERE].
94. Of those alternative foods you do not allow, how frequently was the decision to disallow them made for cost-containment purposes? What other reasons are there not to allow alternative foods?
95. Are there administrative activities associated with allowing alternative foods? Do you track the costs of those activities? How easy or burdensome is it to manage alternative foods?
96. Are vendors aware that other State agencies authorize alternative foods that are not allowed by your State agency? What feedback do you receive from them about WIC-eligible foods that aren't allowed by your State agency?
97. Are participants aware that other State agencies authorize alternative foods that are not allowed by your State agency? What feedback do you receive from them about WIC-eligible foods that aren't allowed by your State agency?
98. Are local agencies aware that other State agencies authorize alternative foods that are not allowed by your State agency? What feedback do you receive from them about WIC-eligible foods that aren't allowed by your State agency?
99. Do you think limiting alternative foods is an effective cost-containment practice?

[12 EBT States agencies only] That is all the questions I have on specific cost-containment practices. Before we move on to a few questions on program outcomes and administrative costs, are there any other cost-containment practices you'd like to discuss?

F. Effects on Program Outcomes

This section is for the 12 EBT State agencies only:

One of the goals of our study is to assess the effects of various cost-containment practices on a variety of program outcomes. I'd like to get your opinions on how the cost-containment practices we've discussed might affect those outcomes. As a recap, we've discussed rebate contracts, limits on the number of vendors, least expensive brand, store brand only, limits on national brands, restrictions on container size, restrictions on form and type of foods, and restrictions on alternative foods. For this section, I'd like to focus on the effects (both positive and negative) of those practices:

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100. How do you think cost-containment practices affect **program participation**? Do you think any of the cost-containment practices we've discussed are likely to have an effect on whether people decide to participate in WIC or decide to leave the program? (Please feel free to hypothesize about practices that are not used by your State agency.) Which practices are most likely to have an effect on participation? Which are least likely?
101. How do you think cost-containment practices affect **access to and availability of prescribed foods**? Do you think any of the cost-containment practices we've discussed are likely to have an effect on whether vendors will consistently have WIC-eligible foods in stock, or whether participants will be able to identify WIC-eligible foods on the shelves? Do you think any of the practices would have an effect on whether participants have easy access to stores with those foods? Which practices are mostly likely to have an effect on this outcome?
102. How do you think cost-containment practices affect **benefit redemption rates**, including participants picking up the full benefit (and not leaving the dangling quart or missing ounces)? Do you think any of the cost-containment practices are likely to have an effect on whether participants redeem their benefits? How does that differ by practice or by food category?
103. How do you think cost-containment practices affect **food selections**? That is, how different are the foods that participants purchase with their benefits from WIC-eligible foods that they might purchase without those restrictions? How does that effect vary by practice or by food category?
104. How do you think cost-containment practices affect the **availability of appropriate foods for participants with special diets**? For example, do cost-containment practices affect the ability of lactose-intolerant participants, vegan participants, participants with certain food allergies, or participants who keep kosher to find foods that meet their dietary requirements? How does this vary by practice or by food category?
105. How do you think cost-containment practices affect participants' **satisfaction with and use of prescribed foods**? Do these practices reduce participant satisfaction with the foods available to them? Are participants less likely to consume the foods they purchase than they would be in the absence of such practices? How does this vary by practice or by food category?
106. How do you think cost-containment practices affect participants' **health outcomes**? Do you think that any cost-containment practices have an impact on the health of participants? Which practices?
107. How do you think cost-containment practices affect **program costs**? Which do you think are the most effective at decreasing food package costs? Which have the least administrative costs? Which have the greatest administrative costs?

G. Wrap-Up Questions

This section is for all 90 WIC State Agencies.

Finally, I have a few more questions about specific foods:

108. What strategies, if any, do you use to contain costs for juice?
- Do you treat juice for women and children differently?
109. What strategies, if any, do you use to contain costs for cereal?

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110. What strategies, if any, do you use to contain costs for whole-grain bread?

Now that we've talked about a variety of cost-containment practices in great detail, I want to go back to a question we started with:

111. What do you think are the most effective cost-containment practices?

- Regarding cost savings?
- Regarding minimal administrative costs?
- Regarding minimal adverse effects on participants?

112. How do all these practices we've discussed compare to one another?

113. What other cost-containment practices should we be examining in our study?

Thank you very much for taking the time to talk with me today. We appreciate all the information you've provided. Before we wrap things up, is there anything else you'd like to share with us about your State agency's cost-containment practices, or cost containment in general?

Thank you!