Appendix F: Public Comment 2

Comment Number: FNS-2022-0015-1254-0026

All Sections: 5.2.10.1.1

Classification: Substantive

Commenter Type: WIC State Agencies/Indian Tribal Organization

Organization: PA Department of Health, Bureau of WIC

Excerpt Text: [Underline: Authorization and Reauthorization Processes]

Preliminarily, PA WIC notes that USDA's estimate as to travel time to vendors is based on travel time of WIC participant to vendor. In PA WIC, there are approximately 1,250 vendors throughout the state. In comparison, in Pennsylvania, there are three centrally located offices [Footnote 3: Harrisburg, PA (Central Office); Reading, PA (Eastern Office); Greensburg, PA (Western Office).] from which PA WIC staff work out of. Naturally, the time it takes a WIC participant to travel to the nearest vendor is significantly quicker than the time it takes a staff member to visit a vendor for a review.

The below charts compare USDA's time estimates for certain milestones with PA WIC's data of it for onsite vendor reviews and vendor application reviews.

[Underline: Table 1: Onsite Vendor Review – Comparison of USDA Estimate to PA WIC Data (1 Staff Member) #]

Round Trip Travel to Vendor USDA Estimate: 20 minutes

Onsite Vendor Review USDA Estimate: 40 minutes

Vendor Training* USDA Estimate: -

Level 3 certification* USDA Estimate: -

[Bold: Total:] USDA Estimate: [Bold: 60 minutes]

Round Trip Travel to Vendor PA WIC Data: 60 minutes

Onsite Vendor Review PA WIC Data: 60 minutes

Vendor Training* PA WIC Data: 60 minutes

Level 3 certification* PA WIC Data: 20 minutes

[Bold: Total:] PA WIC Data: [Bold: 120 minutes minimum; 200 minutes including vendor training and level 3 certification.]

* Due to safety concerns and for efficiency purposes, some milestones may require a second staff member.

* Additional time in addition to round trip travel to vendor and onsite vendor review. Not all onsite vendor reviews include vendor training or Level 3 certification.

[Underline: Table 2: Vendor Application Review - USDA Estimate to PA WIC Data (1 Staff Member)]

Application review new owner USDA Estimate: 40 minutes

Application review existing owner USDA Estimate: 40 minutes

State agency administrative procedures (e.g., generating correspondence, supervisory review, and mailing) USDA Estimate: -

Local agency administrative procedures (e.g., schedule review, minimum inventory exception letter, review announcement letter) USDA Estimate: -

[Bold: Total:] USDA Estimate: [Bold: 40 minutes]

Application review new owner PA WIC Data: 60 minutes

Application Review Existing Owner PA WIC Data: 30 minutes

State agency administrative procedures (e.g., generating correspondence, supervisory review, and mailing) PA WIC Data: 30 minutes

Local agency administrative procedures (e.g., schedule review, minimum inventory exception letter, review announcement letter) PA WIC Data: 30 minutes

[Bold: Total] PA WIC Data: [Bold: 90-120 minutes]