Appendix J: Public Comment 6

Comment Number: FNS-2022-0015-1549-0005

All Sections: 5.2.10.1.1, 3.3.2.3.3, 3.3.2.2.3

Classification: Substantive

Commenter Type: WIC State Agencies/Indian Tribal Organization

Organization: Maryland WIC Program

Excerpt Text: [Blue: Create Two New WIC State Agency Staff Positions to Reflect the Staffing Needs of a Modern, Innovative Program (page 9)]

-- WIC Customer Service Coordinator

-- Description is not a customer service role but more a description for an IT developer.

-- This is handled by contractors, for which we are already paying.

-- These job functions are often divided between different staff.

-- New positions are going to affect each state and would be filled on a state-by-state basis:

-- The educational requirements are stiff. Maryland government is currently relaxing some degree requirements in effort towards greater diversity and inclusion among its workforce.

-- Could the degree requirements be at the state's discretion?

-- Our Program would need to request permanent positions from our Budget Management offices. Maryland is not guaranteed to receive them when requested. It is a very rare occurrence.

-- Contracted positions are also not guaranteed by our Budget and Management office and not as attractive to professionals of the proposed caliber.

-- We believe it will also be hard to fill part-time positions with the new educational requirements.

-- Currently, limited vendor positions are already at capacity and cannot be eliminated or reclassified to cover these new positions without detrimental impact on overall service delivery.

-- The proposed positions are too heavily related to programming and development and most likely be managed under IT departments/units.

-- We don't believe that we would receive additional allotted funding from the state to fill these positions.

-- No Additional Funding:

-- USDA calculated we will spend less time:

-- Performing Vendor Authorizations

-- 45 minutes to review an application for authorization is not an accurate depiction of a properly processed application, especially since states have different application requirements.

-- Application processing times can span over days, more than 45 minutes when aggregated.

-- Travel time for monitoring

-- 20 minutes travel time is not an accurate depiction of travel time to most stores depending on the state's geography. Why is this based on participants' travel time?

-- Travel time can take from 20 minutes to 2 or 3 hours.