Appendix L: Public Comment 8

Comment Number: FNS-2022-0015-1254-0030

All Sections: 5.2.10.1.3

Classification: Substantive

Commenter Type: WIC State Agencies/Indian Tribal Organization

Organization: PA Department of Health, Bureau of WIC

Excerpt Text: [Underline: Offline to Online Conversion and Online Ordering Implementation Costs]

It will take about 5 million dollars to convert Pennsylvania from an offline to online eWIC system. The $90,000 estimate to implement an online ordering system is insufficient. It appears the $90,000 may not include all the associated costs to implement online ordering such as certification process of the POS system.

USDA estimates the online ordering maintenance of $4,000 a month. PA WIC does not have a context for this charge. PA WIC is unaware of any estimates or knowledge of associated online ordering maintenance costs.

[Underline: New State Agency Positions]

The staffing cost estimate of $117,590 for each position seems accurate for the lowest level of employee seniority at a Step 08 pay rate in Pennsylvania, inclusive of employee wages and state paid benefits. The estimated cost does not factor in those entering the position at a higher seniority level. An employee at the higher seniority level would significantly increase salary and state paid benefits beyond the estimate of $117,590 for each position. It also seems the level of expertise the position descriptions seek would be on the low end of the salary scale once the salary and state paid benefits are factored in together.