

# Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA

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**Responding Organization:** Nourish California

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**Area Sections Discussed in the Response:**

Customer Experience Questions 1-7 and General Questions 4, 5, 7, 9, 11, and 12

**Brief Organizational Description:**

Nourish California is a statewide nonprofit organization dedicated to improving the health and well-being of Californians with low income by increasing their access to nutritious, affordable food. We work to shape the programs and policies that should connect — but sometimes stand between — Californians and the resources they need to thrive. We focus our efforts on those experiencing the starkest inequities and the greatest need. Our team engages in advocacy to end hunger, disrupt poverty, and to ensure that all Californians are well nourished.

## Response to Customer Experience Questions

**(1) Have you applied for or accessed USDA programs and services in the past? If so, please describe your experience.**

### **Racial Discrimination and Bias**

In 2020, a survey<sup>1</sup> of Californians found that among those who have accessed public benefit programs, one in five experienced racial discrimination or bias when trying to apply for services including SNAP (known as CalFresh in California) or WIC. Thirty percent of respondents who identify as Black or African American reported experiences of racial discrimination or bias compared to 15% of respondents who identify as Caucasian or white. The experience of racial discrimination or bias was disproportionately high among all respondents of color (23%) compared to white respondents (15%). The experience of racial discrimination or bias was also more common among respondents completing the survey in Spanish (28%) compared to English (18%).

The experience of racial discrimination and bias influences whether someone will attempt to re-engage with public programs. Among those who experienced racial discrimination or bias during the application process for public programs, 80% were less likely to apply for such services in the future.<sup>2</sup>

### **Language Barriers**

The same survey<sup>3</sup> found that among those who have accessed public benefit programs, one in 10 respondents experienced a language barrier when trying to apply for services, including CalFresh or WIC. The language barrier was higher among respondents who completed the survey in Spanish (20%) though notably it was also a barrier for 12% of respondents who completed the survey in English. The experience of language barriers exists across racial and ethnic identities with Black/African American (21%), Latino (18%), and Asian/Pacific Islander (11%) respondents being more likely than Caucasian/white respondents (10%) to have such experiences.

Like the experience of racial discrimination and bias, experiencing language barriers influences whether someone will attempt to re-engage with public programs. Of those

who experienced language barriers during the application for public programs, 90% were less likely to apply for such services in the future.<sup>4</sup>

### **Discrimination, Confusion, and Poor Treatment**

Focus groups<sup>5</sup> conducted among Californians in 2020 also revealed experiences of discrimination that participants did not directly relate to race or ethnicity. Participants shared experiences of employees from public programs/services being impatient with them or seeming reluctant to provide help. As described by one focus group participant:

*It is like they don't want you to ask for help. They ask you about your children and then say if you are unable to care for them why did you have so many. It is like they are personally giving you the money. It is like they are the ones actually helping you. That is how they discriminate against you.<sup>6</sup>*

Male focus group participants said they felt shamed for seeking help for their families and some reported having to bring in their kids to prove that they were a primary caregiver. As one participant shared:

*Because I was a man, I felt discriminated against. There is a lot of folks there, a lot of women with children and they need help for sure, we all do sometimes. But me going in as a man trying to represent my family — I was a man and they looked at me and it felt like maybe like I deserved it —that was just my feeling—that's my takeaway.<sup>7</sup>*

Generally, focus group participants reported that applying for WIC is easier than applying for CalFresh. Participants of all backgrounds identified language barriers, rudeness from CalFresh employees, and confusion about paperwork and eligibility as challenges with applying for CalFresh. One participant from a focus group conducted in Cantonese said:

*For me I think that they should list all the documents required clearly. Sometimes I think there is a discrepancy between the English and the Chinese translation. The requirements listed there is quite different between English and Chinese.<sup>8</sup>*

A participant in a young adult focus group described the CalFresh application process this way:

*Just filling out the paperwork or just the stuff online, I think the confusing part for me was when you get all the paperwork back, there is just so much and I'm like, did I get it, did I not? So that part for me was a little more complicated and then when they call you... they didn't really give me a definite answer, so I'm still kind of confused.<sup>9</sup>*

## **(2) If you have not applied for or accessed USDA programs and services in the past, why not? What would have made it easier for you to apply or access USDA programs and services?**

### **Public Charge and Reaching Immigrant Populations**

A March 2021 study<sup>10</sup> from the UCLA Center for Health Policy Research found that, throughout California, one in four adult immigrants with low income avoided public programs such as Medi-Cal (Medicaid) and CalFresh for fear of harming their immigration status or that of their family members. Exclusionary policies cause indiscriminate damage: even immigrants not subject to the public charge rule have avoided public programs. More specifically, 27% of lawful permanent residents reported avoiding public programs even though the public charge rule does not apply to their applications for citizenship.

These barriers to program participation are tied to harmful outcomes. The UCLA study found that more than half of all immigrants who avoided public programs experienced food insecurity, compared to just over one-third of immigrants who did not avoid programs. Immigrants who avoided public programs were also more likely to be uninsured and to experience delays in accessing medical care, prescriptions, and mental health treatment.

USDA should develop, user-test, and disseminate clear messaging for immigrant communities to combat the lasting, harmful effects of public charge and other immigration policies on the reach of public programs. USDA should direct affiliated state and local agencies to adopt this messaging or use similar methods to develop their own. The messaging should clearly describe eligibility criteria (or the lack thereof) tied to immigration status. The messaging should affirm that participation in public nutrition

programs will not hurt immigration status. Both the written and visual elements (e.g. images) of the messaging should emphasize inclusion of diverse immigrant communities.

To address concerns about the sharing of personal information, USDA should provide program participants and program applicants with clear explanations of what personal data is collected, how it is used, and if/when/how it is shared for other purposes.

### **Linguistic Access**

We regularly hear reports from our network of partners and stakeholders that materials, including applications, for public programs are not translated into languages other than English or are poorly translated. For example, California's state WIC agency only provides an online application for the WIC program that is available in English and Spanish. Such challenges are also described in existing research such as the focus groups cited in Question 1.

Beyond translation, program materials – especially applications – are not designed for ease of use or ease of understanding among applicants. This challenge is further demonstrated by the survey findings cited in Question 1 that show language barriers affect respondents across race/ethnicity and preferred language.

Program materials should be informed by and tested by program participants and program applicants to determine appropriate literacy levels. Program materials should also be informed by and tested by program participants and program applicants to ensure translations are accurate and a good cultural fit.

### **Culture of Eligibility and No Wrong Door**

USDA should foster a culture of eligibility – setting the expectation that all processes, systems, and staff are centered on clients and work to support each client.

In a similar spirit, entry into one nutrition program should streamline entry into other public programs for which a client may be eligible. Data should be shared across nutrition and health programs to facilitate effective outreach. Data should be shared between application systems to ease the burdens of providing redundant information.

## **WIC Remote Enrollment**

Over the course of the COVID-19 pandemic, California leveraged temporary federal flexibilities, including the option for remote enrollment, which enabled WIC to be more responsive to families' needs. During this time, California experienced a nearly 18% increase in WIC enrollment<sup>11</sup> – a reversal of a years-long trend in the other direction<sup>12</sup>. Without the option for remote enrollment, families will once again face barriers to accessibility such as the expenses and time associated with transportation, the availability and affordability of child care, lost wages, and the need to take time off from work. To close gaps in equitable access to WIC, eligibility and certification periods should be extended and the option for WIC families to enroll over the phone and via video appointment should be made permanent.

## **Online Purchases**

Participants in public nutrition programs need and deserve to purchase groceries in whatever way works best for their households. WIC families should have the option to purchase groceries online like CalFresh households.

## **Inadequate Benefit Levels**

Burden, stigma, shaming, and discrimination are often associated with enrollment and participation in public nutrition programs. Inadequate benefit levels amplify those negative experiences. In a 2020 survey of Californians, among those who receive WIC, nearly one quarter reported running out of benefits before the end of the month.<sup>13</sup> The same survey showed a majority of CalFresh participants routinely run out of benefits before the end of the month.

The Thrifty Food Plan does not reflect the current realities and costs of purchasing food. The WIC food package similarly does not sufficiently account for the needs of the populations it serves. According to the National WIC Association:

*It is critical to align any increases to the value of the WIC food benefit with scientific recommendations. The 2017 NASEM Report acknowledged WIC is a supplemental program, but some of the food groups available in the current packages are provided at a more than supplemental level (greater than 100*

*percent of the recommended intake levels in DGA) while other food groups are completely absent from the food packages.<sup>14</sup>*

Establishing benefits levels that accurately reflect the cost of food and account for the nutritional needs of individuals who are — and should be reached — by nutrition programs is critical to ensuring equitable access and equitable outcomes.

**(3) How can USDA, its cooperators, grantees, and partners, better share information with underserved stakeholders about our programs and services? What are the best ways to notify and engage underserved stakeholders about new programs and services or changes to existing services?**

USDA should conduct timely research and engage with underserved stakeholders to identify gaps in the design and dissemination of information. Such research should also aim to identify messengers and sources that underserved stakeholders deem trustworthy.

Stakeholders, including stakeholders representing underserved and under-resourced communities, should be engaged by USDA to co-design and co-develop effective messages. These messages and other resources (e.g. funding, model materials, messaging guides) should be made readily available to increase the capacity of trusted messengers and to optimize the spread of information via trusted sources.

**(4) Describe your experience(s) interacting with USDA staff when trying to access USDA programs and services. How were they helpful? Are local USDA offices staffed sufficiently and do they provide good customer service? What are areas for improvement?**

To advance racial justice and equity and support for underserved communities, USDA can commit to inclusively recruit, hire, and retain staff (including public-facing staff) who reflect the diversity of the communities in which they work and the program participants and applicants they serve. This includes, but is not limited to, recruiting, hiring, and retaining staff who are multilingual and multicultural. All USDA staff, including staff interfacing with program participants and applicants, should undergo continued training on diversity, equity, and inclusion.

USDA should establish both metrics for customer service and accountability for improving those metrics. For instance, USDA can conduct customer service surveys and report findings by race, ethnicity, preferred language, gender identity, and other identities of clients and applicants.

**(5) Are USDA agency websites helpful in providing useful information on programs and services, explaining how specific programs and services work, and explaining how applications for participation are considered? What are areas for improvement?**

USDA agency websites should feature content designed and developed specifically for program participants and applicants. This content should describe eligibility criteria, applications processes, and program benefits. The content should be informed by and tested by community stakeholders, including program participants and applicants. The content should incorporate appropriate literacy levels, quality translations, and inclusive imagery and text that reflects the diversity of program participants and applicants.

USDA agenda websites should also feature content designed and developed specifically for local program administrators and operators. This content should be available in languages used by and preferred by local administrators and operators. For example, all public-facing Child and Adult Care Food Program training materials (from USDA and the California Department of Education) for the new meal pattern were available in only English and Spanish when family child care home providers speak multiple languages in California. In fact, 17% of family child care providers speak a language other than English or Spanish when caring for children.<sup>15</sup>

In order to ensure that all training resources are accessible, USDA should provide training opportunities and materials in multiple languages. Ensuring trainings and training materials are available in multiple languages is an important support for program administrators, sponsors, and operators who must train on-site staff (e.g. child care providers) about programmatic and policy changes. In addition to providing training resources in multiple languages, training resources should account for literacy levels of all trainees.



USDA's websites can be improved as tools for transparent, two-way communication. For instance, the website should make communications channels more clear for interested stakeholders who want to provide feedback to USDA. This could be done in many ways, including providing organizational charts and key contacts for specific programs.

USDA's websites can be improved as tools to share timely updates on policy changes and opportunities to provide feedback on policy before changes are made. Previous opportunities to provide feedback on policy changes under consideration by USDA have not been publicized. For example, we learned about the recent opportunity to provide input on the Thrifty Food Plan from emails from partners and were unable to find any information about the Thrifty Food Plan report through USDA's website.

Providing tailored subscriptions would allow stakeholders to access the types of information that would be more helpful to them. Subscription options could include information such as program-specific data releases, program-specific policy updates, and program-specific opportunities to provide input on proposed programmatic and policy changes. USDA can also increase transparency by making non-confidential communications to state agencies available to public USDA listservs.

#### **(6) What are the barriers to applying for loan and grant programs? How can USDA make loan and grant processes easier to understand and more accessible to underserved groups?**

USDA can uphold principles of equitable distribution of resources, including loans and grants. Specifically, grant and loan criteria should prioritize awarding funds to under-resourced communities. For instance, we have supported the establishment of public-funded grant programs that prioritize the distribution of grant funds to school meal programs serving a majority of students who are eligible for free or reduced-price meals. Offering ample technical assistance to support individuals, organization, and agencies in applying for grants and loans is necessary to provide equitable access to competitive grant and loan programs.

USDA can also uphold principles of equitable distribution of resources by ensuring that any grants, loans, or public programs that would benefit private businesses prioritize businesses serving under-resourced communities; located in under-resourced

communities; owned by women, people of color, and other individuals under-represented in the business sector; businesses that offer their employees a living wage; and businesses that recruit and retain inclusive, diverse staff.

**(7) Have you attended stakeholder meetings and informational sessions in the past? Describe when and how helpful and useful the information was including follow-up by USDA.**

We appreciate increased opportunities for engagement with USDA under the Biden Administration (e.g., regular briefings, invitations for community input via virtual stakeholder listening sessions, and opportunities to provide written comment through informal and formal processes).

In recent months, we have received invitations via partners (rather than USDA itself) to attend information sessions involving USDA administrators (e.g. listening sessions on SNAP and the Thrifty Food Plan). These invitations, while very welcome, are often provided on very short notice. Because these invitations are provided to a select network rather than the public at large, participation is inherently limited to certain stakeholders. To support inclusive engagement of stakeholders, information about opportunities to engage with USDA should be shared publicly and directly from USDA (as well as other sources) whenever possible.

## Response to General Questions

**(4) Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?**

### Meal Pattern Requirements

Meal pattern requirements (e.g., NSLP, SBP, CACFP) can be barriers to offering culturally relevant foods to program participants. For instance, cow's milk is not featured in many East Asian cultures, but milk is a required component for meals served through the federal child nutrition programs and for adult meals served through CACFP. Participants

with a cultural or religious need for non dairy milk must submit a written request for a substitution – and even then the substitution request does not have to be granted by the program operator. These policies and practices inherently center white American culture and unfairly increase burdens and barriers for participants with other cultural identities.

These policies and practices also increase burdens for program operators working to meet the needs of children and adults in their care. For instance, a pilot study of adult day centers serving East Asian adults found:

*The USDA offers little guidance on how to make meals culturally relevant within the context of the program's requirements and appeal to diverse palettes. For example, 8 ounces of milk (or 6 ounces of yogurt) must be offered at breakfast and lunch. However, it is difficult for the ADC center to support preferences and calcium requirements of East Asians through milk, as 90% of Asians have reduced ability to digest lactose (U.S. National Library of Medicine, n.d.). Therefore, it is vital that CACFP administrators offer more information on how to maximize program offerings to meet the unique nutritional needs of ethnically diverse older adults.<sup>16</sup>*

USDA should engage with stakeholders to identify inequitable, exclusionary elements of meal pattern requirements. While ultimately there is a need for inclusive meal patterns that account for the cultural needs of all those who could and do participate in federal nutrition programs, USDA can mitigate barriers (for participants and operators) to utilize currently allowable alternatives.

### **Expectations for Meal Service**

In addition to meal patterns, expectations for meal service within the federal nutrition programs can reinforce barriers and perpetuate inequities. For example, through a conversation with local stakeholders, we learned of a CACFP sponsor who prohibited family style meals in which participants ate with their hands. For the child care provider and the children in care, eating with their hands was a culturally based practice. Family traditions, religious beliefs, community, and social context are important aspects of a meal. USDA should take proactive steps to acknowledge and respect the use of cultural food practices within the federal nutrition programs. These steps can include efforts such

as assessing program requirements, allowable options, and recommended best practices to ensure inclusion of diverse cultural food practices.

### **Purchasing Restrictions**

Purchasing restrictions in CalFresh and WIC limit the ability of participants to procure culturally relevant foods. For example, the WIC fruit and vegetable benefit cannot be used to purchase herbs. CalFresh restrictions on purchasing hot and prepared foods can limit the resources and capacity of participants to acquire food that would best meet their needs and preferences.

### **(5) How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?**

USDA can identify and eliminate barriers that prevent community members, including members of under-resourced communities, from engaging with USDA. In our experience engaging with Californians who have lived experience with poverty, food insecurity, and systemic inequity, barriers may include the need for child care, transportation, and interpretation or translation. USDA should also meaningfully compensate community members for their expertise and time spent engaging with administrators.

USDA can also establish advisory groups composed of clients, advocates, and community-based organizations to inform, design, and vet materials and programs affecting clients and applicants.

To begin establishing and deepening trust with community members, USDA can acknowledge the federal government's history of discrimination, oppression, and exclusionary policies and practices that have harmed and continue to harm under-resourced communities.

**(7) Does USDA currently collect information, use forms, or require documentation that impede access to USDA programs or are not effective to achieve program objectives? If so, what are they and how can USDA revise them to reduce confusion or frustration, and increase equity in access to USDA programs?**

### **Social Security Numbers on School Meal Applications**

While not all applicants are required to include the last four digits of a Social Security Number for the application signee, many school meal application forms fail to make this clear. USDA should design school meal application prototypes that clearly describe when a SSN is not required, inform applicants about the safety of sharing their SSN when necessary, and inform applicants about the safety of disclosing that no SSN is available. Such prototypes should be built using the principles of user-centered design, focusing first and foremost on the needs and concerns of applicants. At minimum, the forms should be easy to read and readily available in multiple languages. The forms should ask for only necessary information, explain why the information is being collected, and explain how it will be used.

### **Referrals for WIC Participants**

Under federal law, WIC local agencies may provide WIC applicant/participant information to a health provider or food provisioner only when there is a release form signed by the applicant/participant (7 C.F.R. § 246.26(d)(4)). We have learned through conversations with WIC local agencies that obtaining and documenting signed release forms is a challenge. We suspect that with remote enrollment now being a temporary option for the program, the challenge has only grown. Guidance clarifying potential business practice alternatives for written signatures may be helpful. For example, USDA could explore the potential for guidance related to telephonic or electronic signatures. Guidance on combined authorization forms may also be helpful. Combined authorizations would allow participants to sign one authorization form for all disclosures of their information from a WIC local agency for outside referrals.

## **WIC Nutritional Risk Assessment**

We appreciate that USDA is undertaking information collection on this topic. We are interested to learn what policies and practices (as demonstrated by existing research) would minimize the burden associated with the risk assessment on program applicants/participants.

## **CACFP Paperwork Requirements**

We frequently hear from CACFP administrators that the paperwork requirements for administering the program are burdensome. The paperwork reduction recommendations developed by a USDA-convened taskforce should be implemented.

**(9) Are there data-sharing activities in which USDA agencies should engage, so that repetitive collections of the same data do not occur from one USDA component to the next?**

## **Social Security & SNAP/CalFresh**

USDA should work with the Social Security Administration to promote better data sharing and dual enrollment processes between Social Security and SNAP/CalFresh. Many states have implemented “Combined Application Projects” that allow people to apply for SSI and SNAP simultaneously. We urge the USDA and SSA to build upon those successful models to allow older adults and individuals with disabilities to be seamlessly enrolled in SNAP when they begin receiving SSI.

## **Data Systems & Data Sharing for Cross-Program Enrollment**

USDA should support (with funding and guidance) the integration and interoperability of state data systems for the administration of federal programs. For instance, connecting California’s WIC MIS and CalSAWS (California Statewide Automated Welfare System) could allow the exchange of data needed for cross-program enrollment. To optimize such connections, USDA should issue guidance (and work with other federal agencies such as the Centers for Medicare & Medicaid Services to issue guidance) that encourages data sharing across federal programs.

**(10) How can USDA use technology to improve customer service? Do you have suggestions on how technology or online services can help streamline and reduce regulatory or policy requirements? What are those technological programs or processes and how can USDA use them to achieve equity for all?**

#### **Online School Meal Eligibility Systems**

The experience with P-EBT in California emphasized the need for a statewide online, school meal eligibility system that is accessible by families, local educational authorities/school food authorities, and state administrators. A statewide system could allow for the standardization of data as well as the timely collection and update of data that's necessary to connect nutrition programs such as school meal programs and P-EBT. USDA can support the design and development of such systems to increase administrative efficiency and help ensure that eligible children do not go unserved by critical nutrition programs.

#### **WIC Nutritional Risk Assessments**

Investments in technology to support the electronic sharing of nutritional risk assessments from health providers to WIC would help streamline the WIC enrollment process.

**(11) Are there sources of external data and metrics that USDA can use to evaluate the effects on underserved communities of USDA policies or regulations? If so, please identify or describe them.**

California-specific data sources could be applicable to evaluating the impact of USDA policies, regulations, and programs on specific communities. The California Health Interview Survey (<https://healthpolicy.ucla.edu/chis/Pages/default.aspx>) assesses the avoidance of public programs (due to immigration concerns) among immigrants and related outcomes such as food insecurity. RACE COUNTS (<https://www.racecounts.org/>) is a tool for assessing racial equity with respect to how well racial groups are faring compared to one another, and how many people are affected. RACE COUNTS includes indicators for food security and food access, among other metrics related to social issues such as economic opportunity and the built environment. California's Health and Human

Services Agency is in the early stages of establishing and publishing an equity dashboard. The dashboard will assess agency programs with metrics related to race, ethnicity, sexual orientation and gender identity. The design, function, and application of this dashboard may inform nationwide efforts to evaluate public programs.

**(12) What suggestions do you have for how USDA can effectively assess and measure its outreach and inclusion of underserved groups and individuals?**

USDA can assess the reach of programs according to participant identities such as race/ethnicity, preferred language, disability, and gender. For instance, metrics could establish the reach of programs like SNAP.

USDA can also improve the support, enforcement, and assessment of support and enforcement of how threshold languages are established and how USDA is assessing and measuring inclusion of threshold languages. For example, a few years ago a sponsor of the Child and Adult Care Food Program ended their sponsorship of the food program in Alameda County. At the time, they sponsored 352 family child care home providers and served over 3,000 children. The CACFP state agency (the California Department of Education, CDE) initiated communication with participating family child care home providers to alert them of their choices for participating under alternative sponsors. They were required to make a choice in order to stay enrolled. However, the communication from CDE occurred only in English, despite many of the providers speaking Spanish as a primary language and 40 of the providers speaking Mandarin. Following the transition, one quarter of the Mandarin speaking providers did not make a selection and stopped receiving the financial support of the food program. Although their reasons for not making a selection are unknown, we believe communication in their primary language could have supported more family child care home providers through the transition.



## Citations

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