



May 24, 2023

Ms. Patricia Bailey
Chief, WIC Vendor and Technology Branch
Policy Division, Supplemental Nutrition and Safety Programs
Food and Nutrition Service, U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Docket ID: FNS-2022-0015

RE: Proposed Rule for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program

Dear Ms. Bailey:

The Society for Nutrition Education and Behavior ([SNEB](https://www.sneb.org)) is dedicated to promoting effective nutrition education and healthy behavior through research, policy, and practice and has a vision of healthy communities, food systems, and behaviors. SNEB is a community of 1,000 professionals actively involved in nutrition education and health promotion. Our work takes place in colleges, universities and schools, government agencies, cooperative extension, communications and public relations firms, the food industry, voluntary and service organizations, and with other reliable places of nutrition and health education information. Our members' expertise and interests make us well-positioned to comment on the proposed WIC rule regarding online ordering and transactions.

We are writing in strong support of the United States Department of Agriculture's (USDA's) proposed rule to enable online ordering and food delivery. The proposed rule takes important steps to enhance access to healthy foods for its target population which, by definition, is low income and at nutrition or health risk.¹ The populations that WIC serves often have reduced physical access to grocery stores that provide a full array of healthy foods.² Online ordering and food delivery can help WIC participants overcome these challenges. Despite positive strides to roll out electronic-benefit transfer (EBT) technology over the past decade, WIC's transaction technologies remain woefully behind that of the Supplemental Nutrition Assistance Program (SNAP) and the commercial marketplace. Nationally, SNAP serves 82% of those eligible, and WIC should serve no lesser a percentage.³ Bold steps to empower State-driven

¹ U.S. Department of Agriculture, Food and Nutrition Service. WIC eligibility requirements. April 4, 2023. <https://www.fns.usda.gov/wic/wic-eligibility-requirements>.

² Rhone A, Williams R, Dicken C. Low-income and low foodstore-access census tracts, 2015–19. U.S. Department of Agriculture, Economic Research Center. Bulletin 236, June 2022. <https://www.ers.usda.gov/webdocs/publications/104158/eib-236.pdf?v=6041.4>

³ U.S. Department of Agriculture, Food and Nutrition Service. SNAP participation rates by state, all eligible people. 2019. <https://www.fns.usda.gov/usamap>.

innovation and to reimagine WIC vendor management could result in a modern, accessible, and equitable shopping experience for WIC families.

Modernizing the WIC shopping experience is critical to retaining participants and realizing the program’s public health mission.

As nutrition professionals, we understand that a healthy diet can enhance the short- and long-term health of pregnant and lactating women, infants, and young children. WIC helps to ensure that people have access to the healthy foods they need during these vulnerable life stages. The program has a well-documented record of public health success; participation in the program results in healthy outcomes for young children.⁴ Thus, the nutrition support that WIC provides is critical to building a healthier next generation and to meeting the ambitious goals set by the White House to eradicate hunger and curb chronic diet-related disease.⁵

Despite the program’s successes, WIC has never reached more than 65% of its eligible population; WIC continues to underserve pregnant women and young children.^{6,7} The shopping experience is often cited as a barrier to both participation and retention, as well as a cause of benefit under-redemption.⁸ Online ordering and delivery could help to bolster participation, retention, and redemption, for example making it easier for participants to identify WIC products. To address the nutritional needs of its target population, the WIC Food Package enables participants to purchase only those items rich in priority nutrients. But current retail environments can make finding WIC-approved foods difficult. Traditional retail environments encourage shoppers to choose from tens of thousands of food items, most of which are not rich in priority nutrients. Online retail outlets could provide filters to select from only WIC-approved items. Online ordering could also enable participants who are often time-strapped and shopping with children to redeem benefits at a time and place that is convenient for them, without the distraction of other products and children.

⁴ Guan A, et al. The revised WIC Food Package and child development: a quasi-experimental study. *Pediatr.* 2021;147(2). <https://doi.org/10.1542/peds.2020-1853>.

⁵ U.S. White House. Biden-Harris Administration national strategy on hunger, nutrition, and health. 2022. <https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf>.

⁶ Guan A, et al. The revised WIC Food Package and child development: a quasi-experimental study. *Pediatr.* 2021;147(2). <https://doi.org/10.1542/peds.2020-1853>.

⁷ U.S. Department of Agriculture, Food and Nutrition Service. National- and state-level estimates of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) eligibility and WIC program reach in 2020. January 2023. <https://fns-prod.azureedge.us/sites/default/files/resource-files/2020-wic-eligibility-report-summary.pdf>.

⁸ Panzera AD, et al. Mapping a WIC mother’s journey: a preliminary analysis. *Soc Market Quarterly.* 2017;23(2). <https://doi.org/10.1177/1524500417692526>.

Given WIC's demonstrated ability to improve the health of vulnerable pregnant and lactating women, infants, and young children, increasing participation should be a top goal. Modernizing the shopping experience is a key strategy to reaching that goal. Online ordering is key, but it must be implemented with equitable access in mind.

USDA must center equitable access to Internet platforms for WIC shoppers.

As WIC moves online, attention must be paid to preserve the program's nutritional quality. With online ordering, items may no longer be in stock when the order is fulfilled. Retailers should not be allowed to substitute WIC-approved foods (e.g., whole-grain bread) with non-WIC approved foods (e.g., white bread). When an appropriate substitution is not available, retailers should refund the unredeemed benefit to the participant's account in a timely fashion. And, to assure that participants do not lose access to desired healthy foods, any unredeemed benefit from unavailable substitutions should be rolled over to the following benefit month. As WIC is intended to deliver priority nutrients over the course of a month, rollover could be limited to the subsequent benefit month. Refunding and rolling over benefits would reduce confusion for participants, promote full use of issued benefits, and reduce technical challenges for users.

USDA should also work to reduce the effects of online platform fees for participants. According to a 2021 National WIC Association and Nutrition Policy Institute survey of 26,000 WIC participants across 12 states, 65% of WIC participants are interested in online ordering/curbside pickup models, but only 35% are willing to pay an out-of-pocket fee to have those foods delivered.⁹ Delivery fees may place online platforms out of reach for many WIC participants.

USDA must provide funding to retailers and State WIC Agencies to support the proposed changes.

Dedicated federal funding for retailers to scale up WIC shopping platforms may be an efficient way to support online access to WIC foods. Such funding could support technical assistance, especially for small and independent retailers, and mitigate retailers' delivery costs. If funding is not available to help mitigate fees, USDA should encourage retailers to take their own proactive steps. The USDA Task Force on Supplemental Foods Delivery has encouraged

⁹ National WIC Association & Nutrition Policy Institute. Multi-State WIC participant satisfaction survey: learning from program adaptations during COVID. 2021. <https://media.nwica.org/nwamulti-state-wic-participant-satisfaction-surveynationalreportfinal.pdf>.



changing the “equal-treatment” provision in WIC vendor regulations to allow for *preferential* treatment of WIC customers, for example, individual retailers waiving fees.¹⁰

SNEB also supports USDA’s proposal to create two new State WIC agency staff positions to help implement new technologies and improve the WIC experience. We urge USDA to fully fund those positions to assure that all State WIC agencies, regardless of size, have the capacity to support such positions.

In conclusion, the members of the Society for Nutrition Education and Behavior supports revisions to the WIC vendor rules. The proposed rule would empower a more modern, equitable shopping experience for WIC families and help to ensure the agency is better prepared to engage with an evolving commercial retail marketplace.

Sincerely,

Barbara Lohse, PhD, RDN, CDN, LDN
President
Society for Nutrition Education and Behavior

¹⁰ U.S. Department of Agriculture, Food and Nutrition Service. Task Force on Supplemental Foods Delivery in the WIC Program: Recommendations Report. September 30, 2021. <https://fns-prod.azureedge.us/sites/default/files/resource-files/Task-Force-Supp-Foods-Delivery-WIC-Recommend-Report.pdf>.