

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

RE: RIN 0584-AE85; FNS-2022-0015

Proposed Rule: 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:

We, the undersigned organizations, write to express our support for the modernization of the Special Supplemental Nutrition Program for Women, Infants & Children (WIC).

Inspired by discussion at the 1969 White House Conference on Food, Nutrition and Health, Congress established the WIC program in 1974 to improve the health of low-income pregnant and postpartum women, as well as infants and children under the age of five. Now, nearly 50 years later, there is an urgent need to update this critical program to ensure it can meet the needs of WIC participants in the 21st Century.

Specifically, families would greatly benefit from the ability to take advantage of online shopping and home grocery delivery, as SNAP recipients and others currently do. Many people who utilize WIC find it challenging to use their benefits in person while managing caregiving responsibilities, transportation, and work. Families who utilize WIC benefits in-person may also face challenges in navigating the WIC shopping experience, including difficulty finding WIC-approved foods in the store and discomfort and stigma at check-out. Resolving barriers in the WIC shopping experience can play a critical role in strengthening WIC participation and encouraging retention, assuring that WIC's public health impacts reach a broader share of the eligible population.

Furthermore, studies have shown that people make healthier choices for themselves and their families while grocery shopping online. A study by the University of Kentucky, No Kid Hungry, and Instacart recently found that individuals with low incomes, including SNAP recipients, who grocery shopped online spent more on fruits and vegetables than those who shopped in-store without increasing their total grocery bill.<sup>[1]</sup>

Therefore, to bring WIC online as quickly and effectively as possible, we respectfully suggest the following adjustments to the current proposal:

1. USDA should create a nationwide certification process for online shopping platforms as an alternative to the proposed retailer-by-state certification process to avoid unnecessary delays.

2. USDA should adopt inclusive regulatory terminology to account for evolving technologies, allowing for a broader range of authentication protocols and paving the way for future transaction innovations like mobile payments.
3. USDA should allow for a limited, one-month rollover of all unredeemed benefits to promote full redemption and address equity concerns stemming from returned benefit when an online order cannot be fulfilled.
4. USDA should amend the equal-treatment requirement in WIC vendor agreements to allow for retailers to treat WIC customers *preferentially*.

Thank you for your consideration of our views and for your commitment to supporting greater access to nutrition for women and children in need.

Respectfully submitted,

Regional/ State/ Local Organizations

Arizona Food Bank Network  
 ACOMERPR  
 Beyond Hunger  
 Catholic Charities Community Services  
 Eleanor Whitmore Early Childhood Center  
 Food Bank of East Alabama  
 Hall Hunger Initiative  
 Hunger Free Colorado  
 Hunger Free Vermont  
 Idaho Hunger Relief Task Force  
 Indy Hunger Network  
 Livingston Food Resource Center  
 Mid Coast Hunger Prevention Program  
 MontCo Anti-Hunger Network  
 New Hampshire Hunger Solutions  
 Partners for a Hunger-Free Oregon  
 San Diego Hunger Coalition  
 Second Harvest Food Bank of Northeast  
 Tennessee  
 The Colorado Blueprint to End Hunger  
 The Village Group

National/ International Organizations

1,000 Days, an Initiative of FHI Solutions  
 Alliance to End Hunger  
 American Muslim Health Professionals  
 Association of State Public Health Nutritionist  
 (ASPHN)  
 Bread for the World  
 Congressional Hunger Center  
 DoorDash  
 Feeding America  
 FoodFinder  
 Grubhub  
 Heuristic Management  
 Hunger Free America  
 IFANCA (Islamic Food and Nutrition Council of  
 America)  
 Instacart  
 March of Dimes  
 MAZON: A Jewish Response to Hunger  
 MEANS Database  
 National WIC Association  
 RESULTS  
 Save the Children  
 Share Our Strength  
 Tackle Hunger  
 The Outreach Program  
 The Root Cause Coalition  
 WBA  
 ZERO TO THREE

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[i] Gustafson, "Online shopping for low-income families," (Aug. 3, 2022), available at [https://bestpractices.nokidhungry.org/sites/default/files/2022-09/NKH\\_Online-Grocery-Study-Exec-Summary\\_Final.pdf](https://bestpractices.nokidhungry.org/sites/default/files/2022-09/NKH_Online-Grocery-Study-Exec-Summary_Final.pdf).