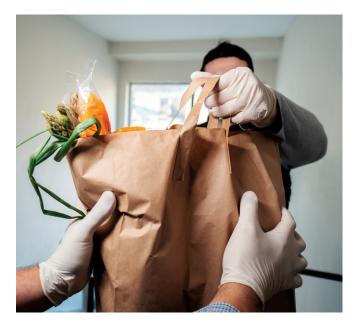NO KID HUNGRY®

WIC ONLINE ORDERING IN PRACTICE:
LEARNINGS AND NEXT STEPS

ACKNOWLEDGMENTS

Thank you to all the interview respondents, and more broadly to the WIC vendors, state and local agency staff, and technology providers who are working each day to ensure and improve access to WIC. Thank you to Karen Deehy for leading efforts to interview WIC stakeholders. Thank you to NWA staff for your feedback and partnership throughout the development and completion of this project.

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EXECUTIVE SUMMARY

While efforts are underway to develop online transaction models for WIC, currently allowable *online ordering* options with in-person transaction and pick-up have expanded in recent years, spurred on by the COVID-19 pandemic. This report summarizes learnings and observations based on these early online ordering efforts (occurring in 2020–2021), to support a better understanding of the current state of WIC online ordering, build on early lessons learned, and identify potential next steps to grow and improve these nascent offerings. Our goal is to provide an additional resource to WIC state agencies, WIC authorized vendors and other stakeholders interested in supporting WIC online ordering options in their communities, and to encourage further data collection and data sharing in order to improve WIC online shopping experiences and increase access to these options.

No Kid Hungry conducted interviews with State WIC Agencies, authorized WIC vendors and technology providers involved in WIC transactions, in order to gather information on what is currently available across the country and begin to track challenges, opportunities and learnings identified to date. In this report, we summarize the status of WIC online ordering offerings in this interim period, as well as gaps in our current knowledge about these offerings.

We provide recommendations on potential next steps, as the WIC community awaits final guidance and associated changes in regulations. Specifically, we highlight the importance of cultivating leaders and champions for online shopping options across different WIC stakeholder groups; the need to provide guidance and review regulations on a wide range of areas that may interact with an online transaction process; the importance of a coordinated and collaborative effort to gather and share data related to WIC online shopping uptake and participant experience; and the potential benefits of clear, coordinated communication prior to and during WIC online shopping.

As WIC leadership and varied stakeholders collaborate to develop solutions for online WIC transactions, thereby easing access to the WIC food package for many participants, we can make a concerted effort to learn from the innovative and constructive efforts that emerged during this unusual and challenging time. The forthcoming USDA rulemaking process and the opportunity for public comment offer critical opportunities for WIC stakeholders to share and build on learnings to date.

INTRODUCTION

More Americans than ever before are using online ordering options for their shopping needs. The COVID-19 pandemic and the need for social distancing led to unprecedented growth in online grocery shopping, with delivery and curbside pickup options that reduced the need for consumers to be physically present in the store while shopping.[1] As consumers become accustomed to shopping online, and as COVID remains a challenge that families must contend with, demand for remote options is likely to continue.

Recent changes in the Supplemental Nutrition Assistance Program (SNAP) through the Online Purchasing Pilots have led to expanded online ordering and online transaction options for SNAP participants across the country. However, current regulations for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) require that the WIC transaction occurs in the presence of a cashier, requiring participants or their proxy to be physically present at the time of the transaction and receipt of goods.[2] In the meantime, *online ordering with in-person (in-store or curbside) transaction and pickup* are among currently allowable options for WIC, and are available in some communities. WIC online ordering with in-person transaction and pickup is the focus of this report. (Fully online transactions, whether with store pick-up or delivery of food items, are not the focus this report.)

In addition to regulations related to the transaction itself, the specifics of the WIC food package create an additional level of complexity for WIC transactions, specifically in comparison to SNAP's dollar-based benefit. WIC food package prescriptions are tailored to each participant's age and nutritional needs. Each month, WIC participants are prescribed quantities of specific foods from the state's Approved Product List, with the exception of the Cash Value Benefit (CVB) which provides a dollar value for the purchase of fruits and vegetables. The prescription-based food package can make for a more complex transaction for vendors as well as participants, but innovations in online shopping create the possibility of easing this process.

Interest in a broader set of shopping options for WIC participants exists against the backdrop of declines in participation and coverage rates for WIC over the last decade.[3] Similarly, while redemption rates vary for different items in the WIC food package (generally between 31–81%, with infant formula standing out with an average redemption rate of 94%), redemption rates for several categories have historically been low (i.e. peanut butter/legumes, infant cereal, infant fruits/vegetables and whole grain breads all around an average redemption near 50%). This indicates a significant opportunity to support higher redemption and access to the full set of benefits available as part of WIC.[4]

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1   Melton, James. "Online Grocery Sales More than Double in 2020." *Digital Commerce 360* November 5, 2021.
     https://www.digitalcommerce360.com/article/online-food-report/

2   With USDA's waiver authority under the American Rescue Plan Act, several states sought and received waivers in order to conduct a WIC transaction without the presence of a cashier, though the temporary nature of these waivers has not led to an expansion in online transaction options for WIC to date. See current waivers here:
     https://www.fns.usda.gov/wic/transaction-without-presence-cashier

3   Toossi, Saied, Jordan W. Jones, and Leslie Hodges. August 2021. The Food and Nutrition Assistance Landscape: Fiscal Year 2020 Annual Report, EIB-227, U.S. Department of Agriculture, Economic Research Service.

4   National Academies of Sciences, Engineering, and Medicine 2017. Review of WIC Food Packages: Improving Balance and Choice: Final Report. Washington, DC: The National Academies Press. https://doi.org/10.17226/23655.

While there are multiple explanations for underutilization of WIC, challenges such as stigma during checkout and identification of WIC-allowable items in-store are consistently identified as barriers to fully accessing the WIC food package.[5,6] Research conducted during the COVID-19 pandemic points to limited access to socially distanced shopping options as the primary obstacle to fully redeeming WIC food packages. In a participant survey conducted by the National WIC Association with 12 state agencies in Spring 2021, with more than 25,000 WIC participants responding, when participants were asked why they don't buy all the WIC foods in their food package, the two most commonly cited reasons were the lack of availability of online shopping for WIC foods (53% of respondents), and the lack of availability of curbside pickup for WIC foods (51%).[7] (The other options included not finding WIC foods at the store (49%), that they did not like some WIC food choices (42%); they did not feel safe at the store due to COVID (37%), a lack of transportation (19%) and less need for WIC due to increased SNAP benefits under the American Rescue Plan Act (17%).)

When asked more specifically about options they *would* use for WIC food shopping if available, 75% reported they would use a self-checkout aisle, 65% reported that they would pre-order WIC foods for pick-up, 65% said that they would use a special section in the store to find WIC foods, and

35% reported that they would pre-order WIC foods for home delivery for an additional out-of-pocket fee. This interest in a variety of shopping alternatives underscores the need for multiple shopping options to support access to WIC foods, and highlights the importance of options beyond home delivery which involve lower or no additional fees for WIC participants. Such options also create opportunities to reduce stigmatizing interactions during checkout, and if built into online systems, easier identification of WIC foods.

5   Chauvenet, Christina, Molly De Marco, Carolyn Barnes and Alice S. Ammerman. 2019. "WIC Recipients in the Retail Environment: A Qualitative Study Assessing Customer Experience and Satisfaction." Journal of the Academy of Nutrition and Dietetics. 119 (3): 416-424.

6   Gago CM, Wynne JO, Moore MJ, et al. Caregiver Perspectives on Underutilization of WIC: A Qualitative Study. Pediatrics. 2022;149(2):e2021053889

7   Ritchie, Lorrene, Danielle Lee, Linnea Sallack, Christina Chauvenet, Georgia Machell, Loan Kim, Lanxin Song and Shannon E. Whaley. "Multi-State WIC Participation Satisfaction Survey: Learning from Program Adaptations During COVID." December 2021. https://s3.amazonaws.com/aws.upl/nwica.org/nwamulti-state-wic-participant-satisfaction-surveynationalreportfinal.pdf

Currently, several efforts are underway to develop and expand online ordering and/or transaction options for WIC participants. These efforts are focused on mapping out potential paths forward for a variety of WIC online ordering and online transaction options. They reflect the many stakeholders and processes necessarily involved in any online solution for WIC shoppers.

- National WIC Association's Online Ordering, Curbside Pickup, and Home Delivery WIC COVID-19 Working Group: In response to the COVID-19 pandemic, the National WIC Association (NWA) convened a working group focused on online shopping/ordering options that allow for limited contact to ensure safe social distancing. The working group, which meets monthly, includes WIC authorized vendors, WIC food manufacturers, WIC state agencies, technology providers and other key stakeholders.

  A subgroup of the working group crafted a guidance document to outline a phased approach to implementing full intelligent ordering with online transactions (i.e., WIC balances are available during the ordering process and compared against remaining benefits during the online transaction).[8]

- WIC Taskforce on Supplemental Foods Delivery: The Consolidated Appropriations Act of 2021 (the Coronavirus Relief Act) required the United States Department of Agriculture (USDA) to form a dedicated task force to study and recommend measures to expand options to redeem WIC benefits that promote convenience, safety, and equity and reduce or eliminate the need for participants' presence in a physical store. This includes options such as online and telephone ordering, online transactions, home delivery and self check-out.[9] The task force submitted their recommendations in a Congressional report in November 2021.[10]

- USDA WIC Online Ordering Grant: In 2020, the Gretchen Swanson Center for Nutrition (GSCN) was awarded funding by the USDA Food and Nutrition Service (FNS) to lead the WIC Online Ordering Grant, a 3-year grant project to evaluate models and provide recommendations to increase the availability of online shopping options for WIC participants. GSCN has awarded four sub-grants to WIC state agencies to explore models that include online ordering with online or in-person transactions, with implementation from December 2021–July 2023.[11]

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8   A coalition convened by the National WIC Association. October 2020. WIC/eWIC Pickup and Delivery Requirements. https://s3.amazonaws.com/aws.upl/nwica.org/fy20_nwa_factsheet_pickup-and-delivery-requirements.pdf Accessed July 26, 2021.

9   USDA Food and Nutrition Service. March 18, 2021. WIC Task Force on Supplemental Foods Delivery Retrieved from https://www.fns.usda.gov/wic/task-force-supplemental-foods-delivery

10 Report on the WIC Task Force on Supplemental Foods Delivery. December 2021. Available at: https://www.fns.usda.gov/wic/congressional-report-wic-task-force-supplemental-foods-delivery

11 Gretchen Swanson Center for Nutrition. (2021). WIC Online Ordering Grant. https://www.centerfornutrition.org/wic-online-ordering?rq=WIC
    Accessed July 26, 2021. As part of the project, the GSCN team constructed a WIC online ordering implementation guide (the Blueprint for WIC Online Ordering) which includes recommendations and things to consider when implementing pilot projects to expand online options. Available here: https://static1.squarespace.com/static/58a4dda16a49633eac5e02a1/t/60c8ea51296905287a9420eb/1623779922155/Blueprint+for+WIC+Online+Ordering.pdf

PROJECT AIM

Notwithstanding these important efforts to identify recommendations and support pilot projects related to WIC online shopping options, a number of WIC retailers across the country have already enabled and implemented online ordering options with in-person transactions and pickup. Available information and data-gathering on the status of these existing online ordering options is minimal, but could provide critical insight and lessons learned upon which we can build future efforts in this space.

The purpose of this project is, therefore, to better understand the current state of WIC online ordering options for WIC participants. Specifically, our aims are to **1)** document the range of current efforts to implement WIC online ordering; **2)** collect and share the experiences and recommendations of WIC state agencies, WIC authorized vendors, and other stakeholders, based on these efforts; and **3)** consider potential next steps and identify opportunities to capture additional learnings from these existing, ongoing WIC shopping options. Our hope is that this process of documenting current efforts can inform efforts to develop longer-term, sustainable solutions in this space, provide a resource to WIC vendors and WIC state agencies interested in supporting online ordering options in their communities, and encourage further data collection related to implementation and utilization of online ordering options.

Allowing and developing a more flexible set of options for redeeming the WIC food package is critical to WIC's continued success, and critical to ensuring equitable access to WIC benefits. These options must respond to the varied needs and realities of WIC families and communities, and might include online ordering with in-person pick-up, home delivery, and self check-out, among other possibilities. Online ordering with in-person transactions and pickup is one important piece of this puzzle. It offers a socially distant option without the additional cost necessarily associated with home delivery, while creating opportunities to minimize stigma and more easily access WIC foods through more equitable shopping options.

As various models are developed across the broader WIC community, we want to ensure that the lessons learned from early experiments with WIC online ordering play an important role in informing the shopping options now under development. Below, we share some details and initial learnings from these models, which are relevant to future WIC online order and online transaction models.

METHODOLOGY

STUDY DESIGN

For this research project, the No Kid Hungry team used qualitative semi-structured interviews to collect information about the status of online ordering for WIC participants. The following questions guided the research:
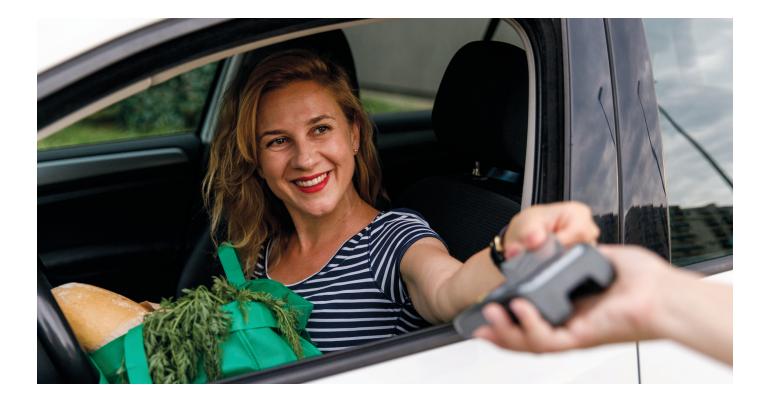
1. Where are online ordering options available? What are the characteristics of WIC authorized vendors offering these options?

2. What WIC online ordering models currently exist? What features do they include?

3. What factors impact the design and implementation of online ordering options?

4. How are online ordering options communicated to local WIC participants?

5. What data is available on WIC participant use and experience of online ordering options?

6. What partners did vendors work with to implement WIC online ordering options?

7. What recommendations do WIC state agencies and WIC authorized vendors have to improve or expand online ordering options for WIC participants?

RECRUITMENT

A convenience sample of respondents targeted for interviews included WIC authorized vendors, WIC state agency staff and others knowledgeable about the current status of online ordering options for WIC participants. Recruitment methods for interviews involved:

• Sharing project information with members of NWA's Online Ordering, Curbside Pickup and Home Delivery workgroup as well as State WIC Directors, and asking for volunteers to participate in interviews.

• Targeted emails inviting stakeholders to participate (i.e. to WIC vendors or state agencies currently implementing or planning online shopping options for WIC participants).

• Asking interviewees for additional key informants that may be knowledgeable about online shopping options for WIC participants.

Key informants that responded to recruitment efforts include **1)** WIC vendors who have initiated online ordering and those that have not yet introduced this option, **2)** State agency staff who have WIC online ordering options within their state as well as those who do not currently have these options, and **3)** technology providers (e.g., EBT processors and Point of Sale (POS) providers). In addition to traditional grocery retailers, WIC vendor respondents included "above-50 percent" (A50) stores that derive more than 50 percent of their revenue from WIC sales, sometimes colloquially known as WIC-only stores.

DATA COLLECTION AND ANALYSIS

Eighteen semi-structured interviews took place between 5/17/2021 and 7/13/2021. Interviews were conducted via Zoom and lasted approximately 30–45 minutes. The interviewer used a semi-structured discussion guide to lead the discussions. Qualitative data collected from the interviews was analyzed for themes using Atlas.ti 9. The following report highlights qualitative themes from the interviews and includes recommendations and items for consideration from WIC vendors, state agencies, and other stakeholders around online ordering options for WIC participants. All quotes included in this report have been de-identified to protect privacy and ensure respondents could be open and forthright in interviews.

PROJECT LIMITATIONS

Data and themes from this project are limited to information collected from those that responded to recruitment efforts. Other initiatives and models may exist throughout the country that are not included here. We also did not speak with any local agency representatives, nor with WIC participants, as part of this project. It is important to incorporate their perspectives in future work on this topic, as local agencies will be critical actors in supporting access to and uptake of online shopping options, and WIC participants can offer a different perspective on barriers to initial and continued use. Additionally, while interview respondents were knowledgeable about the WIC program, not all recommendations from respondents for expanding options for online ordering may be feasible or desirable based on current WIC guidelines.

STATUS OF WIC ONLINE ORDERING

State agencies and WIC authorized vendors were asked about the extent of online ordering options for WIC participants in their area. Overall, respondents reported that there were few vendors currently offering this service. Among the State agencies interviewed for this project, each reported a maximum of only one or two vendors currently offering online ordering for WIC participants in their area.

> *...we have a pretty good handle on our grocers. We communicate fairly regularly. So as far as we know, right now, [Vendor] is the only larger chain store that's currently doing online ordering for WIC participants [in our state].* **—WIC State agency**

However, state agencies frequently heard from WIC participants seeking online ordering options. Respondents reported that demand for online ordering options has grown during the pandemic. Two main drivers of increased demand include the necessity of social distancing due to COVID and the increased availability of SNAP online ordering/ transaction options.

> *Well, there's definitely a want. We get it all the time. Through the WICShopper [app]. There's a feedback button. We've gotten it multiple times. Can you please offer? Why can't you offer online ordering for WIC people?* **—WIC State agency**

> *There's been a high request for women who've just given birth and say they don't want to go into the store, can we do this all online, can I just drive up, pick it up, because I just don't want to be around people.*
> **—WIC State agency**

In most areas, supply of and demand for WIC online ordering options are not yet aligned. In this section, we describe current options for online ordering with in-person pick-up, as well as how implementation has proceeded and the barriers contributing to limited options at present.

CURRENT MODELS FOR ONLINE ORDERING

Despite the challenges described in the following section, some vendors have already initiated online ordering options for WIC participants. The two online ordering models described by respondents included:

- Online ordering with in-store transaction/pickup

- Online ordering with curbside transaction/pickup

Respondents offering online ordering included mid-sized retailers and A50 vendors working in one or more states, and one technology provider that has implemented an online ordering platform servicing small and mid-size retailers in multiple states.[12] Respondents offering online solutions included both independently-owned and corporate-owned retail chains, suggesting that online ordering possibilities are not limited to one vendor—or ownership-type. Building on these basic models, system details varied considerably. We highlight some of that variation across systems here.

Online ordering platforms. WIC vendors described online ordering systems that were available through their websites and/or online mobile apps. These platforms incorporated a wide range of features. Some website and mobile apps have special features such as the ability to scan UPC codes to add products to an order, pull products from previous orders or 'favorites' product lists, or shop from weekly sale items or store circulars. Some vendor respondents described developing their online shopping systems themselves and others described working with outside partners such as their POS provider or other partners.

> So [Retailer's cooperative] might maintain the general infrastructure for us, but it's very specific to each of our stores… So because they're handling our total systems, both in store and online, and also they're handling the back office for a lot of that, it just makes sense that they're involved with that vendor for the computer system platform.
> **—WIC Vendor**

Some vendors reported that WIC participants may select an EBT payment indicator on the website or app, alerting the store that they will be paying by SNAP and/or WIC. Others did not have payment indicators other than an alert that the customer would be paying at the time of pickup (as opposed to doing an online transaction).

> When you go to pay, you push EBT. And so when the person gets to the pickup, the cashier brings out the little swipe card, the swipe box… **—WIC State agency**

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12   Several interview respondents described projects or remote ordering models that fell outside the scope of the current report, but whose design and implementation can provide important lessons in efforts to expand online and remote ordering options broadly. These involve ongoing efforts as well as recent or planned pilots. While we will not review these efforts in detail here, they include various home delivery models, including those that contract with a third party to deliver selected WIC items (see, for example, this summary of a home delivery pilot in Nevada). In addition, with a USDA waiver, the Alaska WIC program provides a fully online ordering/transaction option for remote participants with significant transportation barriers. The model involves a grocery supplier within the state, who partners with their EBT processor to allow for online ordering, followed by online validation through the EBT processor, with the order then shipped directly to the participant. These models differ in their focus on—and costs associated with—delivery, their reliance on third parties, and in some cases the limitation of offering WIC items only/WIC as only form of payment (versus the possibility of a mixed basket transaction), but they provide additional data points and blueprints for stakeholders interested in pursuing their own WIC online ordering solutions.

One State agency worked with the POS provider described above to create a portal on their website with direct links to retailers offering online ordering. The state agency worked with the POS provider to plan the initiative and promote the option to their small and medium-sized retailers, who then worked with the POS provider to create their own "online store" through the ordering platform. The state's site currently has links to five stores with more planned.

> And so the state will put a link on their website. So if the participant goes to that state website, they might see store ABC, they can click on that store link and it'll take them to the store's website, an online website. We might build that website for them, or they might have one of their own
> —*Technology provider*

Intelligent/Non-intelligent ordering. The majority of vendors interviewed described non-intelligent ordering systems, meaning that items are not compared against the participant's currently available WIC prescription balance. One A50 vendor, whose online store is hosted through their POS provider's ecommerce platform, reported that their system is able to display participants' balances based on their last shopping experience at that location. If the participant shops only at this location, the benefit balance would reflect up-to-date information.

> If you're already a customer of ours and you've enrolled in our loyalty program, you will be able to see your WIC balance. So now I'm cautious in saying that because it is only accurate if the WIC participant only shops in our store [to redeem their WIC benefits].
> —*WIC Vendor*

The online ordering platform described above hosts other small to mid-size WIC vendors in several states. The POS provider worked in conjunction with their EBT processor to develop the intelligent ordering system. For states that have an online EBT system, up-to-date benefit information is provided for the WIC customer during the ordering process. For states that have an offline system (as in the example above), participants are able to see their balance from the last time they shopped at that store. The system is able to identify WIC-eligible products based on the store's availability and the participant's category (offline) or benefit balance (online). Offline options are currently being implemented by retailers in several states and the online intelligent ordering model with real-time benefit data is being piloted in several states as well.

> In an online world, we are actually able to, and we are doing this in a couple of different states now, with [EBT provider], they actually provide us the balance on that card for that customer. So that customer actually knows, I have three gallons of skim milk, or I have five boxes of cereal. And so when they go to purchase, then we know exactly what they can purchase in the quantities that they can purchase. —*Technology provider*

Fees. The A50 vendors (i.e. WIC-only stores) interviewed did not charge a fee for their online ordering services. Other WIC authorized vendors reported a fee, typically $5 per order. For some WIC authorized vendors, the fee is reduced or eliminated if the order exceeds a certain amount. One respondent shared that certain product manufacturers offer promotions; if you buy a certain amount of their product, they will pay the fee on that order.

> *When we rolled it out, and we met with the local agencies to talk to them about it, we made sure that people knew your grocery bill, like once it's over $125, I think it goes down to $3. So you know that if you wanted to get the most for the value, do your full shopping, not just your WIC foods* —**WIC State agency**

No vendors reported maximum or minimum order requirements within their online ordering models, and all currently allow split tender for transactions. No vendor respondents described a price differential between products offered online versus in-store, and alternate forms of payment (e.g. credit card) were not required when placing an order.

> *There is not [a minimum or maximum order]. They have had a customer order one carton of a dozen eggs and I was like, Whoa, okay, well, we're not going to charge him the fee because that's crazy.* —**WIC Vendor**

Substitutions. With the exception of A50 respondents that carry mostly WIC-eligible products, all WIC vendors reported that shoppers are able to add notes to their order and decline a substitution for a particular product.

> *So with each item that you put into your cart, you can add a note. There's also an opportunity at the end of the order when you're on your way to checking out, there's a box that is there for any special instructions or additional notes.* —**WIC Vendor**

One A50 vendor reported that substitutions of other WIC-eligible items are reviewed with the participant at the time of pickup. Another A50 vendor shared that unavailable items are greyed out on their online ordering site, prompting participants to select another WIC-eligible substitute.

> *If something's not available, it's greyed out on the app. So they wouldn't be able to order it.* —**WIC Vendor**

Produce. WIC authorized vendors described using a variety of pricing options for produce, depending on the product, including per pound, unit price, or per piece. A50 vendor respondents were more likely to report selling produce in pre-packaged containers by price.

> *We carry about 60 to 70 different produce items in our stores at any one time. They're prepackaged. It's kind of like shopping for produce at Trader Joe's. It's pre-priced and prepackaged. So it makes it easier for folks to use their CVB benefits.* —**WIC Vendor**

Pick-up windows. Vendor responses varied for the number of hours needed to process the online order. The shortest amount of time reported was 1–2 hours to prepare the order and the longest was a day. Vendors also differed in how far out an order could be scheduled for pickup. Some vendors allow participants to schedule a pickup only one or two days in the future, where others allow scheduled pick-ups a week or more in advance.

> *We have to have at least a three hour window. So if you are placing for today, it's 1:17. So right now, the 4:30 would be the earliest slot that you can get. You'd have to have that order submitted by 1:30 to get that 4:30 [slot].* **—WIC Vendor**

> *We do today and tomorrow. So we don't go farther out than two days.* **—WIC Vendor**

Some vendors have a process where they can alert the participant when their order is ready and if the store has curbside pickup, the customer can notify the store when they arrive.

> *The store will communicate with them, saying, okay, your order has been received, your order has been fulfilled, is ready for you to come pick up. They can reply back to the store and say I'm on my way. If the store elects to, they're going to have a curbside pickup… the customer says okay, I'm outside, I'm in slot number three, the retailer can take that tablet with a product, go out to the customer, and have them pay for it on that tablet outside on the curbside.* **—Technology provider**

PERCEIVED BARRIERS TO IMPLEMENTATION

Interview respondents identified three main barriers contributing to the limited number of current online ordering options for WIC participants: the complexity of designing online ordering options for WIC, upfront and ongoing costs associated with implementation, and potential pending changes in federal regulations.

Complexity

Respondents described several issues which make it challenging to implement online ordering options for WIC in particular. Some issues are specific to vendors operating in multiple states, while others are more general challenges that could impact all vendors. These included:

Different state food rules. Authorized product lists (APLs) vary by state and State agencies have different rules about types of allowable foods (e.g., least expensive brand (LEB)). Accommodating differences in food rules is specifically challenging for those vendors operating in multiple states.

> *Having to create integrations on a state by state kind of basis would be incredibly challenging for us… it's a bit complex for a large WIC authorized vendor that is operating with multiple agencies and multiple states. Having to keep up with different APL files and have that reflect online is going to be quite challenging.* **—WIC Vendor**

Different electronic benefits models. By 2021, most WIC State Agencies had transitioned to electronic benefit transfer (EBT) technology. Some State agencies have online EBT systems (magstripe), where items are submitted to the State's chosen processor who then returns approval for covered foods, and a smaller number of State agencies have an offline option where WIC benefits are loaded onto a smartcard. These two options require different systems for how transactions are processed at the point of sale.

> *I also think that the magstripe versus smart card, I think we need one consistent way of doing that. Because that also affects how you go and get the benefits, and having different ways makes it really challenging* —**WIC Vendor**

Multiple systems involved. Designers of vendors' online ordering systems often differ from the Point of Sale (POS) and other providers WIC vendors are using to process their transactions, which may create challenges and additional programming requirements.

> *[The WIC vendor's] POS system versus their internet systems are completely different, different people that are running them. So a lot of them don't understand the WIC world or the SNAP world.* —**Technology provider**

Prescription-based vs dollar-based program. WIC is more complex than SNAP in terms of what types of foods are allowed, and its prescription-based benefits require tracking of the food products themselves (quantities and categories) in addition to the item cost. This adds to the complexity when designing a system to process WIC transactions.

> *Because WIC is more of a prescription-based food package [and] is not monetary, it does a lot of pinging, like from the EBT cards, the process that has to happen. That just is a big limitation* —**WIC State agency**

Costs

Respondents described significant costs associated with designing, implementing and maintaining online ordering solutions for WIC participants. Some costs include those for POS devices for curbside transactions, website design and maintenance, training and marketing expenses, and any store renovations needed to accommodate online ordering.

Additionally, some respondents noted that because WIC makes up only a small portion of most vendors' transactions, there may be some hesitancy to take on the additional work and costs necessary to implement specific modifications needed for WIC online ordering.

> *…for smaller stores that don't have a lot of WIC purchases, in general, is it really cost effective to offer it? Is it costing more to provide the service than what we're actually bringing in in terms of WIC transactions?* —**WIC State agency**

Respondents explained that for smaller retailers, the cost of developing their own online ordering solutions may be cost prohibitive.

> *…the bigger chains, I feel like, are in a better position to be able to have that equipment. They obviously have more money to invest in that type of equipment, but the smaller stores, it's really cost prohibitive. And what type of platforms are really out there for them to utilize, and creating their own is going to cost money and time. So I think those are definitely some barriers.* —**WIC State agency**

At least one state is testing out a shared solution for these smaller retailers, and additional consideration is needed for these vendors.

Federal Regulations

Some WIC authorized vendors described their hesitancy to make large investments in an online ordering solution given that federal guidelines around online transactions are expected to change in the near future. Vendors may not want to make an investment in technology such as curbside POS devices if they will no longer be needed when online transactions become available.

> *A lot of retailers and online payment solution creators seem to be waiting for an update to federal regs or rules around online shopping. That seems to be our largest hurdle.* **—WIC State agency**

WIC authorized vendors may also be waiting for options and solutions around how to integrate intelligent ordering, where the WIC participants' remaining prescription balances are factored into the process, before implementing system changes.

> *I think we have to have some functionality around intelligent ordering, even if we're not completing the transaction online yet. Because look, if we're going to be building towards something, I think we want to build as much of the architecture as we can until the point that USDA allows us to finalize that transaction online.* **—WIC Vendor**

These concerns related to the complexity of WIC transactions, costs associated with the development and maintenance of WIC online ordering, and potential forthcoming changes in federal regulations reflect a wide range of perceived and actual barriers to implementation. WIC leaders must consider these regularly as the slow expansion of WIC online shopping options continues.

IMPLEMENTATION

Vendors that had implemented online ordering options were asked about their implementation process and considerations that influenced their decisions. Similar to the variation observed within the details of online ordering systems, respondents reported variation in the drivers of system implementation, and those that contributed to decision-making. For some respondents, a technology partner influenced decision-making and for others, assessments were made at the store or chain level.

> *Honestly, [POS Provider] was kind of the major driver there. And I would say, in 2019, we were talking about, 'Hey, maybe online ordering, we should start thinking about it.' And then it was like, March 2020. They came to me and said, 'Hey, with everything is going on, what do you think about it?' Like, yeah, let's do it.* **—WIC Vendor**

Two vendors described consulting WIC State agency staff during the implementation process.

> *We work very closely with both state agencies...to make sure that one, our app and our ordering systems were in compliance with existing regulations, but also to kind of get feedback from them.* **—WIC Vendor**

However, not all vendors offering an online ordering option consulted with state agencies prior to implementation. Some State agency respondents learned about the availability of online shopping options not from the vendors, but from their WIC participants or other WIC agencies.

> *We had heard from the local agency; the coordinator reached out to us and said some participants are saying that you can order your groceries online for WIC. And so then we reached out to [WIC authorized vendor] in that city, to talk with them about it.* **—WIC State agency**

Some vendors described piloting online options for WIC participants in one or a small number of stores first, while others implemented in all stores at the same time.

> …we started in one store. We wanted to test it first. That's something I've learned in this business, or with my employees, I've got to start off slow, because it's a change. It's something new. And after about a month in the one store, it was working well, and then we just started rolling it out in multiple other stores. And we want to expand it to more stores to be able to give the flexibility to our customers. **—WIC Vendor**

WIC vendor respondents that had implemented online options were asked about any future changes or expansions planned around online ordering. Some modifications included expanding the option to additional stores, adding a curbside pickup option, creating mobile distribution sites for rural participants, and adding delivery options.

> …part of the issue with WIC participants, sometimes they're in what they call a food desert. There's no grocery stores near them, and then some of them don't have transportation. So potentially, we could literally have a mobile truck or something in a parking lot somewhere. **—WIC Vendor**

UTILIZATION OF ONLINE ORDERING OPTIONS BY WIC PARTICIPANTS

Respondents were asked about the number of WIC participants that are utilizing online ordering and any trends they've observed in the data. Importantly, few WIC authorized vendors or state agencies reported currently tracking the usage of online ordering options for WIC participants, although several vendors said it would be possible within their systems.

> I haven't tried to but I'm sure there's a way… but it's not something we really track. **—WIC Vendor**

WIC authorized vendors that were tracking this data noted that uptake by WIC participants has been slow, with a small number of people utilizing the option, but that it was increasing.

State agency respondents reported that they do not currently receive the level of detail from their EBT providers needed to distinguish participants who use online ordering from those who shop in-store.

> Any [EBT] data that we look at on our side, it just shows the transaction, it does not delineate between whether they went inside the store [to shop], or whether they used [online ordering/curbside pickup]. We don't have a way to differentiate between the two. **—WIC State agency**

We have a lot of reporting limitations through our EBT processor. I mean, it's really frustrating for us, because we are still stuck on sort of this old platform. And so really some very basic…canned reports, … That's really all the information we have. So we definitely do not have that level of information [on utilization]. … I think a little we're not, we're just not quite sure how to get that exact information, even through [the vendor's] system. So I would say there that there's definitely barriers or challenges [to] those types of reporting. **—WIC State agency**

However, technology providers noted that tracking online orders would be possible and that data could be provided to State agencies in the future.

There will be some type of a bit position [within the online message] that will say that this was an online order. So when people are trying to search out with our data tools, they can filter that and say, here's the orders that were online, and here's the orders that were in the store. So those will all be able to be tracked somehow. **—Technology provider**

When asked about any issues around participant uptake of online ordering that are visible in their data, two vendors shared that some participants start the online ordering process but do not complete it.

…right now we're doing anywhere between 120-130 online orders a month. Well, we have over 300 people that start an online order and for some reason they don't complete the process. And that's something [EBT provider] and myself are trying to kind of analyze, trying to find out why. Is there something with the online ordering experience that is confusing, or what is it… **—WIC Vendor**

Most State agency staff in states that had online ordering options described few or no issues reported by participants. One respondent shared that because the option is relatively new and only offered in limited locations, it may be too early to collect significant feedback.

I don't think it's widespread enough to really hear much feedback. I mean, they only implemented [retailer online ordering] in the last six months or so. It really hasn't been very long. So I think we have yet to understand how much the participants that use it are appreciating the service. **—WIC State agency**

Although few respondents reported formally collecting feedback from WIC participants, some vendors did share examples of positive customer feedback.

Most of the customers that have done online ordering, we've had a lot of very positive feedback. They say very easy, user friendly, they love the experience. **—WIC Vendor**

OPPORTUNITIES AND CHALLENGES WITHIN WIC

In this section, we outline a series of specific opportunities and challenges identified by respondents. Consideration of these issues during the development and implementation of online ordering and shopping options may help create an improved WIC shopping experience. These incorporate the varied perspectives of WIC authorized vendors, state agencies, and technology providers. While respondents flagged a variety of challenges, by drawing attention to them here, we hope to encourage others to design, plan and implement with them in mind. While identifying challenges, respondents also referenced solutions or opportunities to think differently about various processes, policies and regulations related to WIC shopping.

NAVIGATING ORDER DETAILS IN THE WIC CONTEXT

Respondents flagged several areas within an online order in which the specifics of WIC may create particular challenges, though these can likely be addressed with appropriate planning.

Substitutions

With current online ordering models, substitutions are often made after the order is placed if an item is out of stock. Depending on training and store procedures around substitutions, in-store shoppers (i.e. store employees picking the order) may choose a substitution that is not WIC-eligible. In some models described above, the WIC authorized vendor may not be aware that the customer is a WIC participant until the pickup/transaction takes place because online shoppers are not asked about the type of payment they will use for the in-person pickup/transaction. When non-WIC-eligible substitutions are made, WIC participants have to pay for the product(s) with an alternate tender or make adjustments with the store personnel at the time of pickup.

I think substitution is going to be one that I think we have to kind of work through. That's definitely one that concerns me. It's not as easy as if you have a shopper that is [paying out of pocket]. There's obviously a lot more leeway in terms of substitution. And so I think that's one that is going to be challenging... **—WIC Vendor**

The ability to identify WIC as the form of payment, or to identify individual items as WIC items, would represent steps towards resolving this issue, even if they cannot address it completely. In some models, in-store shoppers also have the ability to text customers before the pickup/transaction takes place and may be able to prevent some substitution issues.

We really started pushing this texting with substitutions... you have the option to opt in. And basically, when my order is done, I will get a text message and it'll say, click here to go to your order. It will show what we're out of, and what the professional shopper is trying to substitute. **—WIC Vendor**

Some State agencies shared that they encourage participants to add notes about substitutions or deny substitutions for their WIC items if the online system allows for that.

And if the default was left to allow substitutions and the [Vendor] shopper couldn't find the right bread, they're going to substitute it. Now the mom is not having it taken off her WIC card, she's going to be expected to use a different tender. I don't know about you, but there's quite a bit of substitutions that happened over the past year, because of supply. So we were nervous that how would participants handle that or deal with it. Would they be really uncomfortable at time of checkout, if they didn't have the tender to pay for it? And so we've tried to educate them to always uncheck those foods. **—WIC State agency**

There is an opportunity for both retailers and state/local agencies to communicate clearly with WIC participants regarding options to address substitutions. For example, retailers can provide space to flag WIC items (perhaps simply allowing a note on individual items, or a box indicating "WIC"). State and local agencies can develop resources for WIC participants, providing suggestions on how to handle this within an online system.

50-item limit

The 50 unique-item maximum for online EBT orders (EBT Operating rule 4.7.1c), designed to limit message size for data transmission, has the potential to impact the additional fees for which participants are responsible. If participants exceed the 50-item limit, one solution is to split the order into two, doubling the online order fee. During interviews, respondents described two specific issues that could impact how items are counted and ways that participants often exceed the 50-item limit. These include WIC authorized vendors' lack of understanding around the 50-item limit guidelines, and how bottle deposits are processed.

Two states reported issues where a WIC authorized vendor was counting items with the same UPC code as separate items. Under WIC operating rules, several of the same product would be counted as one unique UPC item. If vendors misinterpret the operating rule, participants will reach the 50-item limit sooner. One respondent noted this is particularly important for baby food, where participants often purchase several jars of the same type of baby food.

> *So if you have four jars of spinach, it still counts as four jars, it doesn't count as one [UPC]. That's the way [the WIC authorized vendor] is at least processing that.* **—WIC State agency**

How bottle deposits are recorded within the EBT message could also impact the 50-item limit. In states that have beverage container deposit laws (bottle bills), the consumer pays the deposit to the WIC authorized vendor at the time of purchase and receives a refund when the container is returned for redemption. One State agency reported that each individual bottle deposit, paid by the participant, is adding a unique code that counts towards the 50-item limit for WIC orders.

> *So [the WIC authorized vendor], let's say it's juice, they also charge five cents deposit. And so there's all these other little lines that get added. Our participants are exceeding the 50-item transaction. And so what's happening is that the eWIC card's not paying for their stuff if they don't notice it. If they notice it and have the stuff backed out and have a separate transaction, it's another $5.* **—WIC State agency**

Two respondents shared that with advances in technology, the 50-item limit may no longer be necessary, especially for the larger and medium-sized stores with integrated point of sale technology. One respondent noted that a potential solution might be to map all bottle deposits to a single product code similar to the current process for identifying fresh produce items.

> *That 50-item limit was based, again, on old technology, because message size and message quickness back in the day when these rules were written, that seemed like a good limit because if you get the message size so big, as you're transmitting it, especially on a stand-beside on a telephone line, if that message gets much bigger than that, it can get super, super complicated. But technology is getting better, quicker, faster, as long as you're not on a phone line, on a stand-beside, it's really not an issue.* **—Technology provider**

Coupons and Store Loyalty Programs

A few respondents described challenges around how coupons, discounts, and store loyalty or cash-back incentives were processed when transactions take place. One respondent indicated that the vast majority of transactions with problems are related to coupons.

> *Basically what I do [is] any transaction that has an issue, we have to go through and look at it, and analyze it, and 90% are coupon issues.* **—Technology provider**

One State Agency shared that participants were asked to 'pay back' the cash value of the coupon for a WIC authorized product. The product would be paid for with their benefits, but the participant would be responsible for paying the amount of the coupon with another form of tender in addition to the fee for the online order. The vendor was not aware of the issue and reported that it was due to how their system was configured.

> *I know the rule, they have to treat everybody the same. But by making WIC participants pay back their coupons, they're not… Because you've now paid $5 [online order fee], plus now you've had two Chobani coupons for two bucks each. Now you have nine bucks for the convenience of online shopping.* **—WIC State agency**

It is important that we gather more detailed information on how different vendors are handling coupons in the context of WIC online orders, as well as the range of issues that are surfacing, as the scope and scale of this problem is not clear from the data collected for this project. The WIC community must then provide clear guidance to vendors on how to minimize coupon-related issues and ensure WIC participants are treated as other store shoppers, whether shopping online or in-person.

Relatedly, clear guidance on using store loyalty benefits should be provided to WIC participants ordering online. Many stores now offer quarterly cash-back incentives for loyalty or rewards programs based on the amount/types of products (e.g., store brands) purchased at the store. When these incentives are 'activated', the amount is then deducted from their next purchase. If that next purchase is primarily WIC items, the amount is deducted from that order. One state shared that they advise their participants to use their 'rewards' on items that are not covered by WIC or SNAP such as household goods and save their WIC purchases for a subsequent visit.

> *So in [vendor's loyalty program], every quarter you get rewards back. Well, they will deduct it from the WIC buy. And I don't want it deducted from the WIC buy. Sometimes those moms save that $12 for their laundry detergent, for their toilet paper, for their paper towels. And [WIC] need[s] to pay for those fruits and veggies. [The State agency] needs to pay for that tuna and that milk. And so what they need to do is, if they've drawn down their rewards, not WIC shop the next time.* **—WIC State agency**

Ordering / Pickup Window

Two issues were mentioned around the potential gap between the time a participant places the online order and when they make the in-person transaction.

Expiration rules. The way the WIC benefit expiration rules are currently applied, there is the potential to place an online order and have those benefits expire by the time the pick-up and transaction occur.

> *…let's say your benefits [are] expiring the last day of the month, okay. If you make an order on the 30th of the month… well, by the time they go to pick and deliver and pay for it, the money's gone or is no longer available.* **—Technology provider**

Changing the expiration requirements for WIC benefits to align more closely to the SNAP model would prevent the issue where a participant could place an online order and then have their benefits expire before they receive the items.

> *Now in the SNAP world, that wouldn't be true. If you've committed the dollars to the transaction, then transaction can complete up to, we usually give them 60 days of timeframe to make sure all system adjustments, reversals, clearings, claims and everything else can take place. So there's a timeframe in there that that activity can still finish.* **—Technology provider**

Prescription balances. Participants may have enough benefits to cover a particular item at the time they placed their online order, but if they use their benefits at this or another store during the gap between the online order and the pick-up/ transaction, they may no longer have sufficient benefits to cover their transaction.

> *She'd already used some of her WIC benefits like live in-person before she actually done it online. So she didn't have the benefits to cover what the order was supposed to have in it. Because I guess she just didn't think about it between placing the order and then picking it up.* **—WIC Vendor**

This challenge occurs because, in the context of this model, the benefits are run at pickup (at the time of the transaction), rather than upon ordering. The WIC community must consider various solutions to these potential challenges related to timing between an order and pick-up, and may be able to reduce them by providing clear instructions to WIC participants in advance.

COMMUNICATION AND WIC ONLINE ORDERING

Communications about WIC online order possibilities can come through multiple channels, and can include information about the existence of this option as well as the possibility of providing detailed instructions to potential shoppers.

WIC authorized vendors that had implemented online ordering options were asked how they market their online shopping options and if they had done any targeted marketing or communication with WIC participants. Vendors described targeting their marketing of online ordering options to all customers, rather than targeting WIC participants specifically.

Vendors used a range of marketing methods to reach customers, including radio and television ads, store signage and websites, emails and texts to loyalty/reward program participants, and Facebook or other social media.

From the State agency perspective, respondents described various options for communicating with WIC participants about online ordering options. The most commonly cited method for State agencies was posting information within the WICShopper mobile app. Other communication included social media platforms, information on their state websites, and emails to inform local agency staff about online options available.

> *We basically post on our social media platforms. And we just send an email to our programs to all of the staff to let them know it's an option. And it's on our shopper app. We have a COVID page, and it does indicate it there.* **—WIC State agency**

However, not all State agencies drew on all the options available. For example, one State agency shared that they have not sent communication out to all participants because of the limited number of options currently available.

> *…we probably put it on the banner for WICShopper [app], where they could just click on it and go to it if they wanted to. But we didn't do like a [bulk] text message, or we didn't do a notification to all the participants, because it's not in every participant's area.* **—WIC State agency**

There is an opportunity for both retailers and state and local agencies to provide clear communication to WIC participants, which would alert more participants to the existence of this option in their region, may give more participants the confidence to try it out, and could contribute to fewer issues for both WIC participants and retailer staff managing WIC online orders. Communication could come in various forms, from explicit outreach to WIC customers about this option, to vendors including WIC as a potential form of payment when shoppers are completing their order online. Clearer communication may lead to improved program satisfaction, redemption rates and increasing access to benefits.

SHIFTING ROLES & RESPONSIBILITIES: DATA TRACKING, MONITORING & COMPLIANCE

State agency respondents were asked about any supports needed to ensure long-term maintenance or sustainability of online shopping options. Most felt that responsibilities lied mainly with WIC retailers and less on the State agencies.

> *We're just kind of sitting and waiting. And basically we'll be ready for them when they're ready. Because it's pretty seamless. Again, on our end, there's not a lot we have to do. We have to make sure it works. But it's all good on our end, and participants won't have any issues with it at all.* **—WIC State agency**

While State agencies generally did not feel that the primary burden fell on them in making online ordering options a reality, one consideration mentioned by respondents included compliance and monitoring of online ordering, and in the future of online transactions. State agencies' procedures may have to expand to incorporate monitoring for these options. One State agency respondent mentioned the potential challenge of monitoring whether participants are receiving the items they ordered online at prices that meet State agency guidelines.

> *My issue really is over the monitoring piece, and the compliance piece to make sure that people are getting the right items.* **—WIC State agency**

Some vendors and technology provider respondents did share that they have the capacity to provide data to State agencies that will help them in their future monitoring efforts.

We know who the customers were, how much they bought, the frequency of their visits, how they paid, whether they paid with WIC, or credit card, or cash. And we know the flow, the information, the stores, who they bought it from, what suppliers supplied those products, how much they bought, how much they sold, that type thing. So we could provide a lot of information to the states that would help them automate that audit process. **—Technology provider**

While little data tracking is currently ongoing, as described in the prior section on the Status of WIC Online Ordering, there is an opportunity to leverage data available from retailers and technology providers to improve and grow WIC online ordering options. Specifically, opportunities to standardize data collection related to online orders and redemptions, use that data to engage in process improvements, and formalize information flows between each of these actors could lead to significant benefits for WIC shoppers and program administrators.

CONSISTENCY IN WIC

Several respondents identified critical opportunities to bring more consistency across state policies and practices, and viewed these as critical changes on a path towards offering increased online ordering and transaction options for WIC participants. This will be especially important for vendors who operate in multiple states.

I would also say consistency and uniformity is going to be important. As we develop sort of the infrastructure to do an intelligent ordering system, you can't have different systems across state lines. **—WIC Vendor**

Some vendor respondents shared their hope that the outcome of the USDA WIC Online Ordering Grant, led by the Gretchen Swanson Center for Nutrition, will be a small number of solutions that may be applicable for different size vendors across all states, rather than a larger number of different solutions that State agencies can choose to implement.

Obviously, for us to execute, one solution would be ideal. Maybe out of Gretchen Swanson grants there are two good options, one's a good option for a large retailer, and another is an option for a small retailer. I think that's great. …Where it's going to get complicated is if you have certain agencies that say, "Oh, well, we want to do this, or we want to do that", then you kind of start to run the risk of problems frankly, and not being able to sort of keep up with changes that may need to be implemented. **—WIC Vendor**

Beyond the online ordering systems themselves, respondents advocated for consistency in other aspects of the WIC program. For example, two respondents suggested a national UPC database of WIC-eligible items.

> *It would be wonderful if there was a consistent national UPC database—that was supposed to be built way back when—and that they were all kind of under that umbrella and say "here, you can choose from this, and these are all approved."*
> **—WIC Vendor**

Similarly, more consistent and simplified food rules around product pricing and/or type may make it easier for vendors to design online ordering systems. States with "least expensive brand" rules were noted as particularly challenging for stores to process through online ordering because of frequent price adjustments, sales or other promotions that may result in price disparities between when the order is placed and the pickup/transaction. Changes suggested including setting 'not to exceed' maximums for product categories scalable by peer groups or setting a dollar value for food categories similar to the CVB for fresh fruits and vegetables.

> *I've got three gallons of milk available, versus I've got $20 left to be able to buy that milk that I have available… For me, I think the easiest way would be if it was just still that dollar amount versus the individualized items.* **—WIC Vendor**

These examples highlight how the development of WIC online ordering and transaction solutions creates an opportunity to bring greater consistency to WIC, and greater ease to the WIC experience for both vendors and participants.

Related to rules around food pricing, one respondent noted that requirements to have consistent pricing between online and in-store products could be challenging for monitoring requirements.

> *The regs say that the price needs to be the same whether it's in-store or online, which I think is a huge issue because we would need to know which transactions are happening at the store and look into those details about what did that exact transaction cost? What [do] those items cost compared to the same items purchased on the same day in store, so that's a huge barrier, because we don't get that kind of transaction detail.* **—WIC State agency**

In another call for consistency and simplification, some respondents also noted that the WIC transaction process could be simplified by cutting down on the steps necessary, such as the need for third party processors.

> *I want one thing, and this would make the online process, and specifically the PIN verification, incredibly transparent and easier for us retailers. And that is the ability to go directly with our payment request to the processor. So what's required now is we have to go through these credit card companies, TPPs they're called, third party processors. We're running into barriers and roadblocks and all they do is take a piece of the pie. And there's no reason why we shouldn't be able to go directly to the state and avoid that third party processor, and all of their outages.* **—WIC Vendor**

Beyond the obvious changes needed to WIC regulations to allow for online transactions (e.g., physical presence when entering the personal identification number (PIN) and the concurrent timing of the transaction and pickup), the development of online ordering solutions provides an opportunity for USDA to consider the implications of a wider set of regulations, to update or provide guidance on those regulations as needed, and to support the design of online shopping options that can reach as wide an audience as possible while minimizing difficulties for state agencies and vendors. These respondents suggest that greater consistency and simplification within the program may help support online ordering options that are more sustainable in the long-term and can handle future changes that we do not anticipate today.

OPTIONS FOR SMALL WIC VENDORS

Respondents stressed the need to design option(s) for small- and medium-sized WIC authorized vendors who would not be able to afford the costs associated with designing and/or managing their own online ordering process. Smaller vendors could pay a fee to join or be covered under a larger organization's infrastructure.

> *...but we need ecommerce platforms that can help out the smaller stores, because each small store can't build, and we don't want them to build, their own solution. That's a nightmare and it's expensive.*
> **—Technology provider**

Larger grocery wholesalers or cooperatives may also have the resources to purchase or design online ordering solutions for smaller vendors.

> *So we're lucky because half of our retailers are small or medium stores relying on these two wholesale providers. And if each of them had an online payment solution, it could be launched or made available to all of their clients' stores. And so we kind of have a really favorable setup for small and medium stores in that way.* **—WIC State agency**

With significant costs associated with developing online ordering platforms, creating affordable options for small retailers will help to ensure that online ordering options will be available for a larger number of WIC participants and in more geographic areas. A small number of these currently exist with options for retailers to pay a fee for the service with options to customize their individual customer interface. These options could be hosted by ecommerce providers or grocery wholesalers or cooperatives working with their technology partners.

ONLINE ORDER WIC-ONLY SOLUTIONS

Similar to the suggestions for increased consistency, as stakeholders come together to create online ordering options, there is an opportunity to improve various aspects of the WIC transaction. Respondents proposed various paths for expanding WIC-only online order opportunities broadly, which they felt would ultimately support higher redemptions of WIC benefits. One such path was simply creating WIC-eligible filters at the store level:

> *…there's a little button for WIC products, and the customer then click[s] on that WIC button, and it will show them only the products that are on that state APL, that are carried by that store.* **—Technology provider**

Vendor respondents generally reported that they do not label items as WIC-eligible on their online ordering systems. Although not an issue for A50 vendors, one State agency noted that for retailers who carry WIC and non-WIC items, participants must be fairly knowledgeable about their State's approved food list to participate in online ordering.

> *On [WIC authorized vendor ordering site], there is no icon or indicator that this is a WIC-eligible food. So mom really has to know her WIC foods in order to do that, to go shopping. So I think that potentially could be another spot that could be challenging.* **—WIC State agency**

Another option was creating assisted shopping and delivery models with online ordering to help participants fully redeem their WIC benefits. A State agency working to develop such a model explained:

> *We just want to see, does WIC-only delivery work? Does it help participants redeem more or all of their food benefits? Does it increase participant satisfaction, that sort of thing. Those are the goals of what we're trying to do here.* **—WIC State agency**

A third path identified was through expanded access to A50 stores, which may have an easier time implementing online ordering options because the bulk or all of their products are WIC-approved.

> *The WIC-only stores do [online ordering and] curbside pickup…That's one of the reasons we're excited to have a WIC-only store is because they offer that curbside pickup for them. Among the other great things about WIC-only stores.* **—WIC State agency**

While these WIC-only options could take many forms, when paired with online ordering, they may be an important opportunity for improving the WIC shopping experience and increasing WIC redemptions.

NEXT STEPS AND RECOMMENDATIONS

This snapshot of the experiences of State agencies, vendors and technology providers involved in WIC online ordering highlights early lessons learned and begins to identify gaps in our knowledge. In this section, we provide recommendations on potential next steps for the broader WIC community.

While some stakeholders are awaiting final changes in WIC regulations and/or knowledge of the models that will emerge from the WIC Online Ordering Grant, others are already offering or considering online ordering/in-person transaction options for WIC participants. With this reality in mind, the following recommendations may be useful to those currently considering, offering, monitoring or taking advantage of WIC online ordering options.

CULTIVATE ONLINE ORDERING LEADERS AND CHAMPIONS

As possibilities for WIC online ordering expand, technologically and geographically, it is essential that there are clear roles and responsibilities among all stakeholders. Similarly, the opportunities and challenges identified above suggest the importance of cultivating champions at multiple levels and across the stakeholders necessarily involved: at both state and local agencies, among vendors and technology providers, and at USDA. Rather that waiting for other actors to move efforts forward, these champions must consider if, where and how they can support or expand online options, making WIC shopping more accessible for more participants. Effective, accessible and growing online WIC shopping options will not be the result of one actor, but rather of leaders from all relevant sectors coming together and building on these lessons learned. Similarly, we can expect it to require continued effort and willingness to adjust on the part of WIC agencies, vendors, and technology providers.

PROVIDE RELEVANT GUIDANCE AND REVIEW BROAD SET OF REGULATIONS

As the WIC community awaits the results of the USDA WIC Online Ordering Grant, in the interim, initial guidance on issues that have already arisen may be useful to State agencies and WIC authorized retailers offering or considering an online order option with an in-person transaction. We can build on these early learnings and challenges identified (i.e. around coupons and store loyalty programs) to identify where guidance is needed and consider how we can best support WIC staff, vendor staff, and ultimately the experience of WIC participants. USDA and other stakeholders can provide guidance or tools to support an improved WIC shopping experience in the interim.

It is incumbent on the broader WIC community that we work proactively to ensure that existing and future WIC shopping options do not put WIC participants at a disadvantage. While we cannot anticipate every problem, we can create a better shopping experience for participants and vendors by providing guidance to all stakeholders on how to avoid the challenges of which we are aware.

Similarly, as we move towards online WIC transactions, we must review and consider the broadest set of regulations that may interact with WIC online ordering, and incorporate guidance in these areas (i.e. 50-item UPC limit, least expensive brand, price monitoring requirements, coupon processing, substitution practices).

ENSURE DATA GATHERING AND SHARING

Respondents reported very limited data tracking related to WIC online ordering, sometimes noting that the data would need to be collected by a different stakeholder (i.e., a vendor or WIC technology provider). Expanded initiatives to collect and share data to inform program operations would serve to deepen our collective understanding of challenges and measure the impact of the availability of WIC online ordering on a variety of program metrics. Information on utilization of online ordering options (including repeated usage by WIC shoppers) and redemption rates for online vs. in-person orders can provide insight into the attractiveness and impact of these shopping options. Similarly, comparing data with that available from other pilots involving assisted shopping and/or WIC-only home delivery models can provide additional data points on possible tools or models available to increase redemption rates. Data on participant experience and shoppers' decisions to use or not use an online order option could also provide rich insight. Over the longer term, data linking WIC online ordering use to individuals' program participation could shed light on implications for program retention.

By tracking participant experience across the existing range of WIC online ordering options, we can learn about specific program elements which might be well-received, or which may create barriers to use for WIC shoppers. Systematically collecting and sharing issues and questions that arise—both from WIC participants as well as store staff picking or checking out WIC orders—can help the WIC community arrive at smarter solutions that will better serve all stakeholders. Comparing data from multiple vendors and regions could provide insight into the magnitude of potential issues that have been noted here, such as the expiration of WIC benefits before an online order is picked up.

It is important to clarify which stakeholders are capable of and can be responsible for gathering, tracking and utilizing this data to improve WIC shopping experiences. There may be an opportunity and need for state agencies to take the lead on tracking and sharing data on existing options, drawing on information provided by technology providers and vendors.

SUPPORT CLEAR COMMUNICATION

Current and future WIC online ordering options will be best situated for uptake by program participants with clear, direct communication from multiple stakeholders. Notably, while a limitation of this project is that we did not speak with local WIC agencies, there may be an important role for local agencies to play in supporting and educating WIC participants around WIC online ordering options

Prior to the placing of an online order, there is a need for clear communication about what is possible, what to expect, and how to avoid common problems. This information can come from both state and local agencies as well as vendors, and should be aligned. On the most basic level, where WIC online ordering is available, the fact that online orders can be placed by WIC shoppers and that WIC is an accepted form of payment for online orders, should be clearly stated.

During an online order, small changes may allow for improved communication between WIC participants and vendors. For example, vendors can provide an opportunity to add a note on an item or check a box indicating at item will be paid for with WIC and should be WIC-eligible, in the case of a substitution. Larger changes, such as clearly identifying all WIC-eligible items in a vendor's online ordering system or those available with a WIC participant's current benefits, will hopefully be incorporated in future online transaction solutions.

Written and verbal communication about online ordering options can center WIC participants' experiences as well as those of store employees who will be responsible for picking orders. Doing so will assure that online ordering does not remain an option only for the most tech-savvy WIC participants, but rather is accessible more widely across the program.

CONCLUSION

Several exciting efforts are currently underway to expand and support WIC online shopping. Conversations with state agencies, vendors and technology providers point to important opportunities to improve and expand these online options. Key takeaways include:

- **There has been significant variation in what has been implemented to date.** WIC online ordering with in-person (curbside or in-store) pick-up is not limited to one type of retailer or one region. Vendors making this available have included A50s, mid-sized vendors, those operating across multiple states, independently-owned stores and corporate-owned retail chains. Online order options have been initiated by vendors themselves as well as by state agencies. Future plans should account for this existing variation.

- **Leadership from multiple stakeholders across the WIC landscape will be essential to the success and growth of WIC online shopping.** Development of online order models, communication with WIC participants and vendor staff, and data gathering efforts will ultimately be more successful and lead to greater access for more WIC participants with buy-in from and leadership of different stakeholders, including state and local WIC agencies, vendors, and technology providers. Our interviews suggest that a variety of actors involved in WIC can be champions of WIC online shopping options and effectively support their growth.

- **An equitable WIC shopping experience requires a deep dive into regulations and practices.** New ways of shopping for WIC create new possibilities for disparate shopping experiences. We must design online shopping solutions with these possible disparities in mind, to support equitable access for WIC participants.

- **One shopping option won't work for everyone; online shopping options should respond to the varying needs and capabilities of WIC authorized vendors, WIC participants and WIC agencies.** With the ultimate goals of improving the WIC shopping experience for participants and allowing for easier and greater redemption of WIC benefits, online ordering with in-person pickup reflects just one set of options that can and should be available to participants.

- **Learnings from these existing WIC online ordering options should inform future efforts to make online WIC shopping more widely available, including in the forthcoming USDA rulemaking process.** We encourage those who have implemented, monitored and participated in these early online ordering/in-person pickup options to provide feedback once the USDA issues a proposed rule and the public comment period opens.

A broader set of options for redeeming the WIC food package is one of many changes that can ensure the efficacy and value of WIC going forward. We can build on these early lessons learned, and respond to the challenges and opportunities identified here, to maximize WIC's potential to support the health and well-being of women, infants and children.