

May 2, 2023

WIC Vendor and Technology Branch
Policy Division,
Food and Nutrition Service
P.O. Box 2885
Fairfax, Virginia 22031-0885

Re FNS-2022-0015/RIN 0584-AE85: 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 Madams and Sirs:

As two of the co-chairs of the Bipartisan Policy Center's Food and Nutrition Security Task Force, we are writing in strong support of the U.S. Department of Agriculture's (USDA) proposed rule to reduce barriers to online ordering and internet-based transactions within the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). These are key steps to utilize technology to modernize service delivery, increase program participation and retention, improve the WIC shopping experience, and make redemption of WIC benefits easier for participants and retailers. Established in 2021, BPC's Food and Nutrition Security Task Force provides federal policy recommendations to improve food security and nutrition security through the federal nutrition programs. Its diverse membership includes bipartisan experts in nutrition science and policy, food systems, public health, health care, the charitable food sector, food industry and retail, and more.

In our 2022 policy brief, [Strengthening the Child Nutrition Programs](#), the task force recommended various means by which to modernize the WIC program, including:

- relaxing physical-presence rules to permanently allow remote services
- facilitating WIC's transition to online purchasing
- expanding funding for WIC technology platforms
- increasing access to affordable, high-quality broadband so that participants can more easily access the program and its components

While we recognize that directly addressing expanded funding for WIC technology platforms or access to broadband is outside the scope of this rule, the proposed rule does relax physical-presence rules by creating definitions (i.e., "brick-and-mortar," "internet," and "mobile" vendors) and altering the definition of the term "vendor" to encompass more than "brick-and-mortar" options. We also appreciate that the proposed rule allows states to develop virtual methods of oversight.

The proposed rule requests comments on whether state agencies should have the option to pay for fees associated with online shopping in a retail food delivery system with nonfederal funding or federal funding when necessary to meet participant access or other special needs. BPC's Food and Nutrition Security Task Force recommended in a recent [report](#) that Supplemental Nutrition Assistance Program (SNAP) benefits should be allowed to be used to cover online shopping transaction, delivery, monthly membership, or other fees up to a certain limit, such as \$10 per month per SNAP participant. While not a specific recommendation of the task force, to similarly reduce the burden on both WIC customers and the retailers who participate in the program, it may be appropriate for state agencies to have the authority to use nonfederal funds, or federal funds in limited circumstances, to cover some or all online shopping-related fees.

All of these changes will help facilitate WIC's transition to online purchasing and would help make progress toward improving the lives for the more than 6 million low-income pregnant and postpartum women, infants, and children who participate in the WIC program each year.

Thank you for your consideration.

Sincerely,



Dan Glickman
Former Secretary
U.S. Department of Agriculture
Bipartisan Policy Center
Co-Chair
BPC Food and Nutrition Security Task Force



Ann M. Veneman
Former Secretary
U.S. Department of Agriculture
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