Blueprint for WIC
Online Ordering Projects

June 15, 2021

Prepared by

GRETCHEN SWANSON
CENTER FOR NUTRITION

USDA
This material is based upon work that is supported by the Food and Nutrition Service, U.S. Department of Agriculture.
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# Glossary of Terms

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<th>Term</th>
<th>Acronym Explanation</th>
<th>Definition</th>
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<tbody>
<tr>
<td>APL</td>
<td>Authorized Product List</td>
<td>An electronic list of authorized food products provided to WIC vendors by the WIC State agency.</td>
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<tr>
<td>Allowable replacement</td>
<td></td>
<td>Refers to situation in which an authorized supplemental food item that was ordered online is not available and another authorized supplemental food item that is in the same APL product category and size as the original authorized supplemental food item is approved by the WIC recipient and replaced for the original item in the order.</td>
</tr>
<tr>
<td>Blueprint</td>
<td></td>
<td>The Blueprint for WIC Online Ordering Projects is a resource for WIC State agencies and their partners working to implement online ordering projects.</td>
</tr>
<tr>
<td>Confidentiality</td>
<td></td>
<td>The fact of private information being kept secret. Confidential WIC applicant and participant information is any information about an applicant or participant that individually identifies an applicant or participant and/or family member(s).</td>
</tr>
<tr>
<td>CVB</td>
<td>Cash-Value Benefit</td>
<td>A fixed-dollar amount which is used by a participant to obtain authorized fruits and vegetables.</td>
</tr>
<tr>
<td>EBT</td>
<td>Electronic Benefit Transfer</td>
<td>A method that permits electronic access to WIC food benefits using a card or other access device approved by the Secretary.</td>
</tr>
<tr>
<td>Equitable access</td>
<td></td>
<td>The same ability for WIC participants to participate in WIC online ordering. Some groups and individuals may face additional barriers that should be specifically addressed to achieve equal benefit, regardless of these barriers.</td>
</tr>
<tr>
<td>FNS</td>
<td>Food and Nutrition Service</td>
<td>The agency within USDA that administers domestic government food assistance programs.</td>
</tr>
<tr>
<td>Fraud</td>
<td></td>
<td>Intentional conduct that violates program regulations, policies, or procedures.</td>
</tr>
<tr>
<td>Front-end staff</td>
<td></td>
<td>Staff who directly interact with WIC participants</td>
</tr>
<tr>
<td>GSCN</td>
<td>Gretchen Swanson Center for Nutrition</td>
<td>Independent research institution and author of the Blueprint as part of a cooperative agreement grant awarded by FNS. GSCN is the grantee responsible for making sub-grants.</td>
</tr>
<tr>
<td>In-store transaction/payment</td>
<td></td>
<td>A transaction that takes place in person at the physical location of an authorized store (in contrast to online, or via the internet).</td>
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<thead>
<tr>
<th>Term</th>
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<tbody>
<tr>
<td>Magnetic stripe</td>
<td></td>
<td>Cards with the card number (PAN) encoded on a magnetic stripe on the back of the card. Magnetic stripe EBT cards require a transaction to be authorized through an online connection to the State agency EBT host processing system at the time of sale.</td>
</tr>
<tr>
<td>MARL</td>
<td>Maximum Allowable Reimbursement Level</td>
<td>The maximum price that the State agency will reimburse the WIC vendor for an approved food item. (Sometimes referred to as the “Not-to-Exceed” or NTE).</td>
</tr>
<tr>
<td>MIS</td>
<td>Management Information Systems</td>
<td>System where WIC benefits are issued, and participant information is managed.</td>
</tr>
<tr>
<td>Online ordering system</td>
<td></td>
<td>The internet site a customer uses to select food items for purchase.</td>
</tr>
<tr>
<td>Participant</td>
<td></td>
<td>Pregnant women, breastfeeding women, postpartum women, infants, and children who are receiving supplemental foods, food instruments, or cash-value vouchers under WIC, and the breastfed infants of participant breastfeeding women. For the purposes of this document, this term includes participants, parents/caretakers, and proxies.</td>
</tr>
<tr>
<td>PII</td>
<td>Personally Identifiable Information</td>
<td>Information that can be used to uniquely identify, contact, or locate a single person or can be used with other sources to uniquely identify a single individual.</td>
</tr>
<tr>
<td>PIN</td>
<td>Personal Identification Number</td>
<td>Cardholder-selected four-digit identifier required to be entered for all electronic EBT transactions.</td>
</tr>
<tr>
<td>Processor</td>
<td></td>
<td>Company contracted by a State agency to provide processing services.</td>
</tr>
<tr>
<td>Smart Card</td>
<td></td>
<td>WIC Smart Card processing uses a payment card that has a computer chip embedded on the card; commonly referred to as a Smart Card. All WIC transactions are completed by updating the WIC food balances on the chip at the time of the sale.</td>
</tr>
<tr>
<td>State agency</td>
<td></td>
<td>Organization within State government responsible for operating the WIC program.</td>
</tr>
<tr>
<td>Transaction, Online/Offline</td>
<td></td>
<td>The process by which a WIC participant pays for supplemental foods with WIC benefits.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A transaction may be online and include payment at the time of an internet order, or offline and include payment at the time of delivery or pickup.</td>
</tr>
<tr>
<td>UPC</td>
<td>Universal Product Code</td>
<td>An identification code printed on the packaging of foods.</td>
</tr>
<tr>
<td>USDA</td>
<td>United States Department of Agriculture</td>
<td>The Federal department responsible for agricultural production, rural services, and food assistance programs.</td>
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<tr>
<td>Term</td>
<td>Acronym Explanation</td>
<td>Definition</td>
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<tr>
<td>WIC vendor</td>
<td></td>
<td>Entity authorized by the State agency to provide authorized supplemental foods to WIC participants.</td>
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<tr>
<td>Void</td>
<td></td>
<td>To cancel a previously authorized and completed transaction, resulting in a reversal.</td>
</tr>
<tr>
<td>WIC Online Ordering</td>
<td></td>
<td>The process a WIC participant uses to select food items for purchase via a web-based ordering system, platform, or site. Online ordering may include either online or offline transactions (See Transaction).</td>
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</table>
1) Introduction

In September 2020, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) awarded a cooperative agreement grant to the Gretchen Swanson Center for Nutrition (GSCN) to implement online ordering for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). This 3-year partnership was funded to support the exploration of online ordering with online and offline transactions for Magstripe and Smart Card electronic benefits transfer (EBT) systems for WIC participants, parents/caretakers, and proxies (hereafter referred to as WIC participants). Online ordering has recently gained popularity among Americans as a grocery shopping mechanism known for its convenience, time-saving attributes, and ease of use. Households that participate in WIC should have the opportunity to shop for foods, especially those needed to address nutritional deficits, the same way others shop for food, by ordering online. The COVID-19 pandemic has also heightened interest in WIC online ordering to reduce risk of exposure to the virus.

1.1 Purpose of the Blueprint for WIC Online Ordering Projects

GSCN conducted a formative study with WIC community members to gather expert input on the policy, technical, and programmatic factors important for the implementation of online ordering in WIC. The outcome of this formative study is this implementation guide known as the “The Blueprint for WIC Online Ordering Projects” (the Blueprint).

Initially, the Blueprint will serve as a resource for Statewide EBT WIC State agencies and their partners working to implement online ordering projects as part of the “WIC Online Ordering Sub-grant Project” (to be funded in September 2021). Upon completion of the sub-grants, the Blueprint will be updated to include revisions and best practices as evidenced by the evaluation of the sub-grant projects. Thus, State agencies that want to implement WIC online ordering projects outside of this funding opportunity are encouraged to use the Blueprint as an informational resource.

While the Blueprint was created with WIC State agencies as the primary audience, any WIC community member interested in exploring or implementing a WIC online ordering project may benefit from its contents. Additionally, action items and recommendations included in the Blueprint may be the responsibility of the WIC State agency or deemed appropriate to be addressed by another partner or collaborator.

1.2 Overview of the Blueprint for WIC Online Ordering Projects

The Blueprint is arranged in chronological order of suggested activities to successfully plan, implement, and maintain WIC online ordering projects. Some WIC State agencies may be in the early stages of planning an online ordering project, while others may have already implemented projects or have current projects underway. Regardless of the project’s status, this document contains guidance for each step that follows WIC requirements and ensures program integrity.
2) Planning and Preparing for WIC Online Ordering Projects

WIC State agencies should engage in multiple planning and preparation steps to successfully implement a WIC online ordering project. A thorough implementation plan for the WIC online ordering project will provide a foundation for initiation of project activities and serve as a working document that the implementation team may reference at any time during the project. This section provides guidance for the recommended implementation steps; however, it is not intended to be an exhaustive list. State agencies may need to expand or tailor activities to best fit the needs of their agency, State, Indian Tribal Organization or Territory, partners, and WIC participants.

2.1 Assemble Implementation Team

WIC State agencies, including Indian Tribal Organizations and U.S. Territories, are the leaders in implementing a WIC online ordering project; however, they cannot do it alone. WIC State agencies should assemble an implementation team comprised of key decision makers and staff that will help to design and develop processes and systems for online ordering. Internal to the WIC State agency, team members may include the State agency director and WIC vendor manager, in addition to project management and technology support. External to the WIC State agency, recommended implementation team members include the State agency’s EBT processor and at least one WIC vendor willing to implement the online ordering project. Additional external team members may include entities that build or support online ordering systems, third party payment processors, WIC local agencies, and WIC participants.

The implementation team should define specific tasks and roles for each team member and/or organization to ensure a successful implementation of the online ordering project. The implementation team should also establish a meeting schedule and communication structure to coordinate activities and monitor progress. Implementation teams may also need to determine a process for decision making for transparency and an action plan to ensure the project deliverables are met.

2.2 Determine the Scale

WIC State agencies should consider the scale of the online ordering project, and this may be done prior to assembling the implementation team or in collaboration with the implementation team. These decisions may be driven by State agencies’ experience with online ordering, the number of interested WIC vendors, capacity and expertise among supporting partners, and the need to reach WIC participants in specific settings or regions. In short, this decision will be highly specific to the context of each State agency, partnering WIC vendors, and the overall goals for the online ordering project. State agencies are encouraged to consider the potential implications the proposed project may have for equitable access to WIC online ordering for both WIC vendors and participants. Implementation teams should consider factors associated with scale up and out of online ordering beyond the initial project. Evaluation of the online ordering project and considerations of the lessons learned during the project should be documented and incorporated into future efforts to improve or expand online ordering.¹

For all projects, State agencies must work with GSCN (e.g., for sub-grants) or USDA FNS, as applicable to identify any flexibilities needed to complete the proposed activities, before implementation. WIC online ordering with the transaction occurring during in-store or curbside pick-up is currently allowed. WIC State agencies may also choose to design WIC online ordering projects that allow for online transactions. Projects that propose online transactions will require additional planning and engagement with implementation team members, as well as USDA FNS, prior to implementation. This could include potential consideration by USDA FNS of flexibilities, if needed and allowable, to applicable program requirements.

¹Please note for the “WIC Online Ordering Sub-grant Project,” all selected State agencies will be required to conduct an evaluation of their sub-grant project. Please see the corresponding Request for Proposals for more details.
2.3 Establish Timeline

A timeline specific to the online ordering project should be created. One recommendation is to split the project’s timeline into the three phases as outlined in this document. The time allotted to each of these phases will depend on various factors, including experience with WIC online ordering, scale of the current project, and the time it takes to secure the necessary flexibilities and to establish or update contracts. Some suggested milestones are provided below. WIC State agencies may need to include additional requirements and activities as part of their State agencies’ rules and regulations that are not listed here.

**Phase 1: Planning and Preparation**
- Establish a WIC online ordering project implementation team with each member assigned specific responsibilities.
- Define the scope of the WIC online ordering project.
- Identify and work with GSCN (for sub-grants) or FNS, as applicable to identify necessary flexibilities to implement the WIC online ordering project, as planned.
- As necessary, establish new or revise existing agreements with WIC vendors to accomplish online ordering project goals.
- Consider working with procurement and legal counsel to ensure that online ordering is consistent with rebate contracts.
- Establish or amend contracts with EBT processors or any other contracted entity involved.
- Design and build or adapt existing online ordering system to WIC online ordering project.
- Develop a plan for monitoring and collecting WIC program data from the online ordering system and/or vendor during implementation (Phase 2).

**Phase 2: Implementation**
- Test the proposed online ordering solution.
- Develop appropriate informational materials and conduct training on the WIC online ordering project.
- Promote the online ordering opportunity for WIC participants.
- When the WIC online ordering system is live, track and troubleshoot problems during the ordering, transaction, and fulfillment process.
- Develop and refine functions within the ordering, transaction, and fulfillment process based on initial lessons learned from administering the online ordering project.
- Track data and analyze outcomes; refine processes and reporting of WIC program data from the online ordering system.
- Plan for WIC online ordering project maintenance and ongoing monitoring and compliance activities.

**Phase 3: Maintenance**
- Continue to track outcomes and analyze data to make needed adjustments for long-term, sustained implementation.
- Develop a process for WIC State agency administrative functions, such as routine monitoring, authorization of WIC vendors, and certification of WIC vendors to engage in WIC online ordering.
- Develop a plan and timeline for expansion to additional WIC vendors within the State agency.
- Continue to monitor and develop additional processes or reports for WIC program integrity in the online ordering system.
3) Requirements for WIC Online Ordering Projects

WIC online ordering projects are allowed under existing WIC regulations when the transaction is completed at the time of in-store or curbside pick-up. However, online ordering projects that plan to use online transactions will require the State agency to work with GSCN (for sub-grants) or USDA FNS directly, as applicable, to identify the necessary flexibilities for the specific requirements that impact the implementation of their projects, prior to implementation. Projects that propose online transactions may require additional planning and engagement with implementation team members, as well as GSCN or USDA FNS, as applicable, prior to implementation. This could include potential consideration by USDA FNS of waivers, if needed and allowable, to applicable program requirements. The implementation team should identify these requirements early in the planning process.

The table below identifies existing requirements in the WIC EBT Operating Rules and WIC Code of Federal Regulations (CFR) that may apply to WIC online ordering projects. This list is not intended to be exhaustive, rather it is a starting point for the implementation team to review prior to planning and implementing their online ordering project. State agencies are advised to consult with GSCN (for sub-grants) or USDA FNS, as applicable, for questions specific to their project.

Table 3-1. Current regulatory requirements that may apply to WIC Online Ordering Projects

<table>
<thead>
<tr>
<th>Topic</th>
<th>Citation</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>EBT Definition</td>
<td>7 CFR 246.2</td>
<td><strong>Electronic Benefit Transfer</strong> (EBT) means a method that permits electronic access to WIC food benefits using a card or other access device approved by the Secretary.</td>
</tr>
<tr>
<td>Vendor Definition</td>
<td>7 CFR 246.2</td>
<td>Vendor means a sole proprietorship, partnership, cooperative association, corporation, or other business entity operating one or more stores authorized by the State agency to provide authorized supplemental foods to participants under a retail food delivery system. Each store operated by a business entity constitutes a separate vendor and must be authorized separately from other stores operated by the business entity. <strong>Each store must have a single, fixed location, except when the authorization of mobile stores is necessary to meet the special needs described in the State agency’s State Plan in accordance with §246.4(a)(14)(xiv).</strong></td>
</tr>
<tr>
<td>Fees</td>
<td>7 CFR 246.12 (h)(3)(xxviii)</td>
<td><strong>EBT third-party processing costs and fees.</strong> The vendor shall not charge to the State agency any third-party commercial processing costs and fees incurred by the vendor from EBT multi-function equipment. Commercial transaction processing costs and fees imposed by a third-party processor that the vendor elects to use to connect to the EBT system of the State shall be borne by the vendor.</td>
</tr>
<tr>
<td></td>
<td>7 CFR 246.12 (h)(3)(xxix)</td>
<td><strong>EBT interchange fees.</strong> The State agency shall not pay or reimburse the vendor for interchange fees related to WIC EBT transactions.</td>
</tr>
<tr>
<td>Equitable Treatment</td>
<td>7 CFR 246.12 (h)(3)(iii)</td>
<td><strong>Treatment of participants, parents/caretakers, and proxies.</strong> The vendor must offer program participants, parents or caretakers of infant or child participants, and proxies the same courtesies offered to other customers.</td>
</tr>
<tr>
<td>Topic</td>
<td>Citation</td>
<td>Requirement</td>
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<tr>
<td><strong>Differential Pricing</strong></td>
<td>7 CFR 246.12 (g)(4)</td>
<td><em>Vendor selection criteria: competitive price.</em> The State agency must establish a vendor peer group system and distinct competitive price criteria and allowable reimbursement levels for each peer group. The State agency must use the competitive price criteria to evaluate the prices a vendor applicant charges for supplemental foods as compared to the prices charged by other vendor applicants and authorized vendors, and must authorize vendors selected from among those that offer the program the most competitive prices. <strong>The State agency must consider a vendor applicant’s shelf prices or the prices it bids for supplemental foods, which may not exceed its shelf prices.</strong> In establishing competitive price criteria and allowable reimbursement levels, the State agency must consider participant access by geographic area. The State agency must inform all vendors of the criteria for peer groups, and must inform each individual vendor of its peer group assignment.</td>
</tr>
<tr>
<td><strong>On-site Preauthorization Visit</strong></td>
<td>7 CFR 246.12 (g)(5)</td>
<td><em>On-site preauthorization visit.</em> The State agency must conduct an on-site visit prior to or at the time of a vendor’s initial authorization.</td>
</tr>
<tr>
<td><strong>Cashier Presence</strong></td>
<td>7 CFR 246.12 (h)(3)(vi)</td>
<td><em>Signature on food instruments and cash-value vouchers.</em> For printed food instruments and cash-value vouchers, the vendor must ensure the participant, parent or caretaker of an infant or child participant, or proxy signs the food instrument or cash-value voucher in the presence of the cashier. In EBT systems, a Personal Identification Number (PIN) may be used in lieu of a signature.</td>
</tr>
<tr>
<td><strong>Curbside and delivery cashiers</strong></td>
<td>7 CFR 246.12 (h)(3)(xiii)</td>
<td><em>Vendor training of staff.</em> The vendor must inform and train cashiers and other staff on program requirements.</td>
</tr>
<tr>
<td></td>
<td>7 CFR 246.12 (h)(3)(xiv)</td>
<td><em>Accountability for owners, officers, managers, and employees.</em> The vendor is accountable for its owners, officers, managers, agents, and employees who commit vendor violations.</td>
</tr>
</tbody>
</table>
| **Refunds and Exchanges** | 7 CFR 246.12 (h)(3)(ii) | *No substitutions, cash, credit, refunds, or exchanges.* The vendor may provide only the authorized supplemental foods listed on the food instrument and cash-value voucher.  
(A) The vendor may not provide unauthorized food items, nonfood items, cash, or credit (including rain checks) in exchange for food instruments or cash-value vouchers. **The vendor may not provide refunds or permit exchanges for authorized supplemental foods obtained with food instruments or cash-value vouchers, except for exchanges of an identical authorized supplemental food item when the original authorized supplemental food item is defective, spoiled, or has exceeded its “sell by,” “best if used by,” or other date limiting the sale or use of the food item. An identical authorized supplemental food item means the exact brand and size as the original authorized supplemental food item obtained and returned by the participant.**  
(B) The vendor may provide only the authorized infant formula which the vendor has obtained from sources included on the list described in paragraph (g)(11) of this section to participants in exchange for food instruments specifying infant formula. |
<table>
<thead>
<tr>
<th>Topic</th>
<th>Citation</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Timing of Transaction and Benefit Deduction</td>
<td>7 CFR 246.12 (h)(3)(iv)</td>
<td>The vendor may accept a food instrument or cash-value voucher only within the specified time period.</td>
</tr>
<tr>
<td></td>
<td>7 CFR 246.12 (h)(3)(v)</td>
<td><em>Purchase price on food instruments and cash-value vouchers.</em> The vendor must ensure that the purchase price is entered on food instruments and cash-value vouchers in accordance with the procedures described in the vendor agreement. The State agency has the discretion to determine whether the vendor or the participant enters the purchase price. The purchase price must include only the authorized supplemental food items actually provided and must be entered on the food instrument or cash-value voucher before it is signed.</td>
</tr>
<tr>
<td>Monitoring</td>
<td>7 CFR 246.2</td>
<td><em>Routine monitoring</em> means overt, on-site monitoring during which program representatives identify themselves to vendor personnel.</td>
</tr>
<tr>
<td>Balance Inquiry</td>
<td>EBT Operating Rules 4.6.1 (a)</td>
<td>Balance Inquiry – to provide the WIC Cardholder with a shopping list and/or to retrieve the balance of the Prescription benefit prior to beginning a purchase.</td>
</tr>
<tr>
<td>Receipts</td>
<td>EBT Operating Rules 5.5</td>
<td>At a minimum, the following types of receipts shall be provided to a WIC cardholder in printed format and may be provided via email or text message if allowed by the WIC State agency.</td>
</tr>
<tr>
<td>Cards per Transaction</td>
<td>EBT Operating Rules 4.7.1 (d)</td>
<td>Only one WIC EBT card may be accepted per transaction.</td>
</tr>
</tbody>
</table>
There are several possible pathways WIC State agencies and their partners may take to implement WIC online ordering projects. The basic requirements outlined below for WIC online ordering projects are designed to assist key WIC partners and collaborators in developing the systems necessary to offer WIC online ordering with payment online while protecting the integrity of the WIC program. Importantly, WIC online ordering with offline, in-person transactions (payment at the time of in-store pickup, curbside pick-up, or delivery) are not included here as that is currently allowed under WIC program regulations. Therefore, unless otherwise stated, “transaction” refers to “online transaction” in Sections 3.1-3.3. These basic requirements are national in scope, and there may be additional State agency requirements. While the WIC vendor needs to meet the following requirements, the responsibility for ensuring these requirements are met lies with the WIC State agency (See section 2.3 Establish Timeline, above, for specific steps that State agencies should conduct to establish and manage a WIC online ordering project).

**3.1 WIC Vendor Requirements**

- Vendor must be a WIC-authorized vendor.
- The WIC vendor will be subject to State agency cost containment requirements for supplemental foods ordered through the online system according to the policies established by the State agency.
- The online ordering system utilized by a WIC vendor must be capable of supporting WIC redemptions, including:
  - Identification of WIC-eligible items.
  - Authentication of benefits via a Personal Identification Number (PIN) or an alternative method approved by FNS.
  - Error handling that includes messaging displayed to customer as appropriate to the situation.
  - Ensuring only WIC-eligible foods can be processed as part of the WIC transaction by matching to the State agency Authorized Product List (APL) and the participant’s food prescription.
  - Not charging sales tax on WIC purchases unless manufacturer coupons are subject to State tax.
  - Allowing for the payment of non-WIC items, split-tender for CVB fruit and vegetables, order fulfillment fees, and delivery fees with a non-WIC tender.
  - Handling of variably priced CVB items in accordance with State agency mapping policies (WIC EBT Operating Rules 11.3).
  - Matching voids back to the original transactions.
  - Transacting WIC benefits within the first and last date of use.
  - Discounts, if applicable.
  - Meeting additional requirements in the Operating Rules, as applicable:
    - Allowing WIC participants to confirm the items to be deducted from their WIC benefits.
    - Allowing WIC participants to pay for WIC or non-WIC items with another tender type.
    - Handling declined transactions for nonsufficient quantity or not currently on the APL file. Note: the declined message identifies the declined items by the Universal Product Code (UPC).
    - Purchases approved for partial payment when an item exceeds the State agency established Maximum Allowable Reimbursement (MARL) or Not-to-Exceed level.
    - Optimize benefit redemption when benefits are allocated in the same food category to a subzero subcategory and the 000 broadband subcategory (also called Aggressive Redemption).

**3.2 WIC EBT Requirements**

- Listed below are the WIC EBT requirements for online ordering systems. This list is not intended to be exhaustive, rather it is a starting point of the requirements expected in the online ordering systems.
  - Transaction and redemption data (EBT Operating Rules 4.6.3).
  - No minimum transaction amounts or quantities shall be required of the WIC cardholder (EBT Operating Rules 4.7.1 b))
- The maximum number of unique UPC or PLU items (EBT Operating Rules 4.7.1 c))
- Split tender (EBT Operating Rules 4.7.2.1 and 4.7.3.1)
- Any discounts (EBT Operating Rules 4.7.5)
- Bottle deposits and grocery bag fees (EBT Operating Rules 4.7.5.6)
- Declined transactions (EBT Operating Rules 4.7.6)
- Support up to six State agency APLs if more than one WIC agency utilizes the web site (EBT Operating Rules 5.2 b))
- Use the State agency card Issuer Identification Number to identify the correct State agency APL and authorized food items (EBT Operating Rules 5.2 d))
- Printed receipts (EBT Operating Rules 5.5)
- Support the data elements for balance and purchase receipts (EBT Operating Rules 5.5.1)
- PIN security or allowable alternatives per FNS approval (EBT Operating Rules 9.1)
- Support APL file handling (EBT Operating Rules 11)
- Support Dispute Resolution (EBT Operating Rules 14)

### 3.3 WIC Online Ordering System Security Requirements

- The WIC vendor’s online ordering systems (e.g., website, mobile application) must comply with the current FNS systems/transaction security requirements and guidance as outlined in the relevant Code of Federal Regulations, Operating Rules for WIC EBT, and/or WIC EBT Technical Implementation Guide (except where flexibilities have been granted). Further, several State agencies have additional requirements relevant to systems/transaction security that should be followed where applicable. If issues arise that are not addressed by existing regulations, rules, and/or guidance from FNS and/or the relevant State agency, then established industry standards for systems/transaction security should be followed.
- Successful completion of end-to-end testing in the online production environment with the State agency or their designee is required prior to opening up online ordering to WIC participants.
- Protection of WIC participant privacy, and any sharing or other uses of WIC participant data, must comply with FNS requirements and guidance as outlined in the relevant Code of Federal Regulations, Operating Rules for WIC EBT, and/or WIC EBT Technical Implementation Guide, and must comply with applicable State agency requirements.
- WIC participants must by default be opted out of sharing any data or information that is not necessary for completing an online order, executing a transaction, conducting order fulfillment, and/or providing selected items to the WIC participant. WIC participants must therefore have to actively opt in to sharing non-necessary data.
  - Before opting in to sharing non-necessary data, WIC participants must be informed about the online ordering system’s use of cookies to store data related to access and use of the online ordering system, and if so, indicate whether these cookies retain personally identifiable information (PII) data and how the cookies can be deleted or avoided.
  - Before opting in to sharing non-necessary data, WIC participants must be informed about the online ordering system’s security practices and policies. This information should be readily available to the WIC participant in an easily understood format.
4) Optimizing the WIC Online Ordering Experience

The requirements, outlined in Section 3, will ensure functional and secure WIC online ordering and transactions for WIC participants; however, innovation within existing WIC requirements is encouraged for all WIC online ordering projects. There are many variations beyond the requirements that could enhance the WIC online ordering experience. WIC State agencies and their implementation team partners are encouraged to develop systems that are user-friendly for WIC participants, WIC vendor staff, and EBT processors.

During the development of this document, WIC community members provided many ideas and options for improving WIC online ordering. The recommendations outlined below may apply to one or many of the members of a WIC online ordering implementation team, and, as such, WIC State agencies should determine which member(s) would handle each action item.

Recommendations are listed below for creating systems and processes that ensure the ease and efficiency of fulfilling online orders; ensuring WIC online ordering systems and processes address system security, protection of PII, and fraud; and creating opportunities to enhance training and uptake of WIC online ordering.

4.1 Create WIC Online Ordering Systems for Shopping and Transactions

- Create, disseminate, and implement policy guidance for WIC vendors on the appropriate use of WIC logos and acronyms to identify WIC-eligible items for online ordering systems. For States that require WIC items to be clearly labeled in-store, this could possibly be replicated in the online ordering system.
- Create a WIC online ordering system that allows for WIC participants to apply filters of the items displayed to increase ease of selecting products aligned with their benefits. These filters may take on different forms and functions.
  - A basic filter could display all WIC and non-WIC products available and apply a WIC flag based on items listed in the State agency’s Approved Product List (APL).
  - An enhanced filter could identify or display only WIC items available at a WIC vendor location based on the State agency’s APL.
  - An intelligent ordering filter could display WIC items based on quantities of each food category and subcategory in the WIC participant’s current benefit balance and display eligible items from the State’s APL. Additional enhancements such as pictures may also be possible.
- Create WIC online ordering systems that account for WIC participant levels of literacy, language, and disability requirements.
- Offer options for WIC participants to choose whether or not they receive allowable replacements while ordering by offering alternative authorized supplemental food item options based on their prescription as well as APL availability. If no alternative authorized supplemental food items are available, this should be clearly communicated.
- WIC vendors may maximize the use of Cash Value Benefits (CVB) by providing options to purchase produce at a set price or weight to ease burden for participants ordering online and staff fulfilling orders.

4.2 Develop Processes for WIC Online Order Fulfillment and Provision

- Develop a WIC vendor policy to clearly communicate if WIC online orders are eligible for allowable replacements or adjustments to an order. If order delivery is being offered, be sure to include how allowable replacements or adjustments will be handled for delivered orders.
• If applicable, develop a means of communication to obtain WIC participant input of potential allowable replacement requirements prior to completing the order. This could be through text alerts or direct contact from WIC vendor site staff who are charged with fulfilling orders.

• If applicable, create options for allowable replacements of WIC items after the online order is placed but before the transaction is complete. These allowable replacements would be required to be authorized supplemental food items, within the same product category on the APL, be approved by the customer, and if needed, reprocessed or price adjusted.

• Use mobile card reader technology capable of creating itemized transactions to identify and correct any issues with invalid item selection according to WIC vendor policy.

• Develop and communicate WIC vendor policy on fees associated with WIC online ordering, pick up, or delivery. Service charges may be paid for with a non-WIC tender. Any applicable fees must be clearly communicated before the order is placed.

• Develop policies to address canceled or abandoned orders. These policies should be clearly communicated to WIC participants. Encourage WIC participants to contact vendor sites if an order is going to be canceled. Ideally, this would happen prior to order fulfillment or when orders go out for delivery. Similarly, for delivery orders, standard protocols on number of delivery attempts and processes for orders that are unable to be delivered must be followed.

• Maintain the safety and quality of perishable items and implement processes in accordance with State/local policies if WIC vendors provide delivery options.

• Develop policies to ensure a stigma-free WIC online ordering pick up or delivery experience. Ensure there is not a difference between WIC participant and non-participant experiences.

4.3 Security, Confidentiality, and Monitoring

• During the design and initial testing phase of WIC online ordering systems, develop processes, trainings, and protocols to ensure basic requirements related to data security and confidentiality of PII are met.

• Develop guidance for WIC vendors to provide WIC participants on how their data will be used/shared and any risks associated with opting to use the WIC vendor’s online ordering system for WIC online ordering. WIC vendors should also be prepared to field any related questions about data security and/or privacy protection from WIC participants.

• Develop educational materials for WIC participants that explain best practices in protecting their own PII that can be disseminated along with WIC online ordering outreach activities.

• Develop training materials for WIC vendors to use as supplements to their own staff training around protecting PII during order fulfillment. Training materials may include information about how best to protect the WIC participant in terms of limiting who knows what about the participant during the online ordering experience (e.g., only the WIC vendor’s fulfillment staff/ “pickers” know they are fulfilling a WIC order, only the curbside/delivery attendant needs to know the name of the participant).

• Amend or update WIC vendor agreements to include specifications on WIC online ordering security and confidentiality standards. This process may include review and adjustments to ensure basic security and confidentiality standards are met and adding new processes for WIC vendor authorization and certification for online ordering.

• States should consider an additional process for currently authorized WIC vendors to complete in order to participate in WIC online ordering with online transactions to ensure security and privacy standards are met.

• Develop new processes for routine monitoring and compliance buys that include protection of PII during physical order processing of online orders to ensure compliance.
4.4 Fraud Detection

- Create and implement new processes for mitigating, monitoring, and responding to WIC participant- and WIC vendor- level fraud specific to online ordering.
- Document the types of WIC participant- and WIC vendor-level fraud encountered and indicators of said fraud and participate in lessons sharing across States in accordance with allowable practices per FNS.
- Track and document transaction-level indicators, such as in-store or online order, how the order was received, and allowable replacements/adjustments made to track trends and address needs as appropriate.

4.5 Training

- Provide training to all implementation team members (e.g., State agency, local agencies, EBT processors, any third-party providers), as well as front-end staff at local WIC clinics and vendor stores, including new staff, fulfillment staff, and delivery staff. WIC online ordering trainings should be included with organizational onboarding for new employees at each of the involved entities. Trainings could include, but are not limited to:
  - WIC online ordering project onboarding (i.e., introduction to WIC online ordering project)
  - Resources for implementation (i.e., guidance for WIC vendor site staff on how to select appropriate items)
  - Guidance on rules and regulations (i.e., existing flexibilities)
- Document and track the trainings conducted and completed by implementation team members and front-end staff.

4.6 Promotion

- Create WIC online ordering educational materials for all implementation team members. Educational materials may include general promotional materials as well as documents that outline the applicable WIC requirements for the project. State agencies may utilize any available Federal guidance materials.
- Identify WIC online ordering project “champions” within WIC State agencies, local agencies, and vendor sites that can answer questions from implementation colleagues or WIC participants.
  - For WIC vendor sites, this may include having video tutorials and ‘how to’ guides posted online, a customer service hotline, or online chatbot. These WIC vendor resources can help address participant questions, such as how to sign up for and use the online ordering system.
  - For WIC local agencies, this may include a WIC online ordering specific help station where WIC participants can be assisted in the process of completing an online order. The local agency can direct the WIC participant to the WIC vendor resources discussed above.
- Identify stores that offer WIC online ordering and specify their range of services (e.g., offline (in-store or curbside) or online transactions, delivery) that are offered. WIC State agencies, WIC local agencies, and WIC vendors may all participate in these promotional activities.
- Promote WIC online ordering opportunities during WIC certification appointments, with flyers or similar materials that are available at WIC clinics or vendor sites, and by updating WIC participant internet sites and vendor online ordering systems.
- Ensure promotional materials can be accessed across a range of devices (e.g., mobile applications, tablets/iPads, laptops, or other devices). All materials should accommodate WIC participant levels of literacy, language, and disability requirements.
5) Implementation of WIC Online Ordering Projects

Implementation begins when WIC participants are officially able to order WIC-approved food items online. Successful implementation requires ongoing efforts by the WIC online ordering implementation team. At this point, the activities for the implementation team transition from planning and preparation to active monitoring of the implementation activities. A point of contact should continue to monitor the project in the early weeks of implementation. Early implementation activities include monitoring participant engagement and redemption rates, identifying and resolving problems with the online ordering system, and sustained communication with staff, partners, and WIC participants.

5.1 Address WIC Participant Uptake

The scale of WIC online ordering projects may vary, but all projects need to engage enough participants to determine if the online ordering, transactions, and other elements of the designed project can be implemented as intended. The implementation team may engage in promotion of the online ordering project to raise awareness and uptake among participants. Promotion materials also should be developed in coordination with the State agency to ensure materials meet applicable requirements, including WIC service mark requirements. Promotion should include plain language on which WIC vendors and specific store locations are offering WIC online ordering. For low uptake or engagement, adjustments to the promotions to engage more participants may be needed for the project. Additions or changes should be tracked to determine which method yields the desired results for uptake.

Depending on the scale of the WIC online ordering project, a soft open (i.e., in a single location) or a kick-off event hosted by a local WIC clinic may be strategies that promote online ordering and provide a designated time for local agency and/or WIC vendor staff to be available to demo WIC online ordering. These events also allow participating WIC vendors and store staff to practice WIC order fulfillment and engaging with participants at pick-up or delivery. Framing this event as kick-off or as an opportunity to try out online ordering reduces the expectation for a seamless experience and the potential for frustration by participants and WIC vendor staff. It also provides the opportunity for the implementation team to identify errors and problems with the process that can be mitigated prior to the official launch date.

5.2 Identify and Resolve Errors

Even with careful planning, implementation of any new system and associated processes can come with unique challenges. A successful implementation will require ongoing efforts by the implementation team to identify and solve issues that arise. A point of contact and triage system for addressing problems should be established. This point of contact may differ depending on characteristics of the issue. For example, if an error should arise with a transaction, someone who knows the technical aspects of this process should be assigned as the point of contact. Once the project has been implemented for a few weeks, a Frequently Asked Questions (FAQ) document could be developed and posted on the WIC vendor’s online ordering system or given to local agencies to provide to WIC participants.

While a formal evaluation of the implementation of the WIC online ordering project may not be feasible, considerations around specific outcomes are beneficial to ensure the project is working as intended. Implementation teams may consider tracking the following process outcomes: uptake and participation, order errors, the points in the process where errors occur, the number of allowable replacements, and completed transactions. In addition, implementation teams may track implementation and ongoing cost, such as the cost associated with implementation and maintenance for the various systems (e.g., State agencies, WIC vendor) and the types of costs (e.g., human resources, technology). Tracking these processes will allow for early identification and resolution of problems. Tracking the solutions, including adjustments or modifications to the online ordering system and/or processes, is also important.
Brief, regularly scheduled check-ins with the front-end staff may be helpful to identify and resolve issues. The implementation team may also hold other meetings or informal interviews with other members involved in the project, including WIC participants, to identify satisfaction, barriers, and facilitators to implementation. Information from these communication channels may be used immediately (i.e., to change a process for fulfilling an order) or lead to larger modifications of the project that require more discussion and logistics planning (i.e., changing how allowable replacements are handled).

Lastly, during the implementation phase, State agencies will need to begin to develop processes for long term implementation, which includes developing processes for ongoing compliance activities specific to the online ordering option. Areas for action may include monitoring functions such as fraud detection, use and maintenance of State APLs in online ordering systems, and considerations for management information systems (MIS) data and reports specific to online ordering. Online ordering projects may provide State agencies and their partners the opportunity to create new processes that streamline administrative functions and maintain program integrity.²

### 5.3 Maintain Communication

Communication and trainings are important to ensure successful implementation and uptake of online ordering projects. As with any project, maintaining clear and open lines of communication across all partners will prevent misunderstandings. While a plan to communicate across all implementation team members may have been established in the planning and preparation phase, it is important to consider how this communication will continue as new considerations, issues, and changes arise during implementation. WIC State agencies should consider how to best relay information regarding updates or changes to procedures and processes to WIC vendors. Additionally, WIC vendors should establish a mechanism to inform any front-end staff or those responsible for fulfilling orders of these updates.

²Please note that GSCN will expand on this section after compiling and analyzing the lessons learned from the sub-grant projects.
6) Maintenance of WIC Online Ordering Projects

WIC online ordering projects require an investment by State and local agencies, vendors, and other WIC community members. These projects will provide the framework and insights as to what is possible and what could be improved as the projects continue over time. Ideally, online ordering projects will be improved, maintained, and expanded to reach all WIC participants. Understanding the ongoing maintenance activities and the resources necessary to sustain those activities are essential for long-term sustainability. Suggested maintenance activities include:

- Track and measure data and outcomes affiliated with the WIC online ordering projects to ensure the projects are running optimally for as long as possible.
- Develop processes specific to WIC online ordering that meet their State’s requirements for routine monitoring, the authorization of WIC vendors, and the certification of WIC vendors for online ordering.
- Continue communication on the WIC online ordering projects across implementation team members.
- Share findings and plans to expand the scope and scale of the projects with WIC online ordering partners and community members.
- Identify short- and long-term goals for improvement of processes and the potential to increase reach and impact of their online ordering projects. Continue to consider equitable access, including the size and types of participating WIC vendors as well as the geographic reach of projects.
7) Conclusion

This Blueprint was developed to help support WIC State agencies and other WIC partners and collaborators as they continue or begin their WIC online ordering projects. The Blueprint has outlined important considerations and provided guidance on how to approach the implementation of a WIC online ordering project. While the Blueprint is not an exhaustive document, it will serve as a resource for State agencies interested in implementing online ordering. Through increased engagement in WIC online ordering projects across the country, lessons learned and best practices will continue to be identified and disseminated among WIC community members to strengthen each project and improve the ability for WIC participants to order their groceries using online ordering systems.