# Blueprint for
# WIC Online Shopping Projects

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RESEARCH ★ PARTNERSHIP ★ EVALUATION

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# Glossary of Terms

| Term | Definition |
|---|---|
| **Allowable replacement** | An alternative supplemental food item within the same category on the Authorized Product List (APL) provided to the participant when the original item selected in an online order is not available. |
| **Authorized Product List (APL)** | An electronic list of authorized food products provided to WIC vendors by the WIC State agency. |
| **Cash-Value Benefit (CVB)\*** | A type of electronic benefit that is a fixed-dollar amount used to obtain authorized fruits and vegetables. |
| **Code of Federal Regulations (CFR)** | The codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government. The CFR includes the Federal requirements for WIC. |
| **Confidentiality** | 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).

Confidential vendor information is any information about a vendor that individually identifies the vendor, except for vendor's name, address, telephone number, website/e-mail address, store type, and authorization status. |
| **Electronic Benefit Transfer (EBT)\*** | A method that permits electronic access to WIC food benefits using a card or other access device approved by the Secretary. |
| **Equitable access** | The ability for WIC participants to participate in online shopping similar to non-WIC participants. Some groups and individuals may face additional barriers that should be specifically addressed to achieve equal benefit, regardless of these barriers. |
| **Food and Nutrition Service (FNS)** | The agency within USDA that administers domestic government food assistance programs. |
| **Food instrument\*** | A voucher, check, electronic benefits transfer card (EBT), coupon or other document that is used by a participant to obtain supplemental foods. |
| **Fraud** | Intentional conduct that violates program regulations, policies, or procedures. |
| **Front-end staff** | Staff who directly interact with WIC participants. |
| **Gretchen Swanson Center for Nutrition (GSCN)** | Independent research institution and author of the Blueprint for WIC Online Shopping Projects as part of a cooperative agreement, WIC Online Shopping Grant, awarded by FNS. |

\*Denotes a definition that FNS proposed to change in the Online Ordering and Transactions and Food Delivery Revisions To Meet the Needs of a Modern, Data-Driven Program Proposed Rule.

| Term | Definition |
|------|------------|
| **In-store transaction** | A transaction where the payment is completed in person at the physical location of an authorized store (in contrast to an internet-based transaction). |
| **Internet-based transaction** | A transaction where the WIC payment is completed through the payment section of the online ordering system, platform, or site. This terminology is being used in lieu of "online transaction" to avoid confusion with transactions that occur using online EBT technology. |
| **Management Information Systems (MIS)** | The system where WIC benefits are issued and participant information is managed. |
| **Maximum Allowable Reimbursement Level (MARL)** | 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). |
| **Online ordering** | The process a customer (including a WIC shopper) uses to select food items for purchase via an internet-based ordering system, platform, or site. |
| **Online shopping system** | The internet site or smart phone app that a customer uses to select and purchase for food items for purchase through an online system, platform, or site. |
| **Online shopping** | The general use of an online, internet-based shopping system, platform, or site. The term can encompass online shopping with or without internet-based transactions (e.g., the transaction can occur via the internet, in store, curbside, or at the point of delivery). |
| **Personal Identification Number (PIN)** | A cardholder-selected four-digit identifier required for all electronic EBT transactions. |
| **Personally Identifiable Information (PII)** | Information that can be used alone or with other sources to uniquely identify, contact, or locate a single individual. |
| **Processor** | A company contracted by a State agency to provide specific processing services, such as benefit redemption and transaction routing. |
| **Redemption** | The process in which a vendor submits records of electronic benefits for redemption and the State agency (or its financial agent) makes payment to the vendor. |
| **Reversal** | The partial or complete nullification of the effects of a previous purchase transaction that could not be processed as instructed. Benefits are returned to the WIC participant's prescription benefit balance. |
| **Smart Card** | WIC Smart Card processing uses a payment card that has a computer chip embedded in the card. All WIC transactions are completed by updating the WIC food balances on the chip at the time of the transaction. |

| Term | Definition |
|---|---|
| **The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)** | The Special Supplemental Nutrition Program for Women, Infants, and Children authorized by section 17 of the Child Nutrition Act of 1966, 42 U.S.C. 1786. |
| **Transaction** | The process by which a WIC shopper exchanges their WIC benefits for supplemental foods. |
| **United States Department of Agriculture (USDA)** | The Federal department responsible for agricultural production, rural services, and food assistance programs. |
| **Universal Product Code (UPC)** | A type of product identification code printed on the packaging of foods. |
| **Void** | To cancel a previously authorized and completed transaction, resulting in a reversal of the transaction. |
| **WIC participant** | Pregnant women, breastfeeding women, postpartum women, infants, and children who are receiving supplemental foods or food instruments, or cash-value vouchers under the Program, and the breastfed infants of participant breastfeeding women. |
| **WIC shopper** | A person shopping using WIC benefits (i.e., a WIC participant, proxy, or a parent or caretaker of an infant or child participant). |
| **WIC State agency** | The health department or comparable agency of each State; an Indian tribe, band, or group recognized by the Department of the Interior; an intertribal council or group that is an authorized representative of Indian tribes, bands or groups recognized by the Department of the Interior and that has an ongoing relationship with such tribes, bands, or groups for other purposes and has contracted with them to administer the Program; or the appropriate area office of the IHS. |
| **WIC-authorized vendor** | A business entity authorized by the WIC State agency to provide authorized supplemental foods to WIC participants under a retail food delivery system. |

# Introduction

The retail grocery industry has changed dramatically in recent years. Online grocery shopping has gained popularity among Americans due to its convenience, time-saving attributes, and ease of use. Online shoppers can use multiple forms of payment to purchase grocery items and choose to pick up items or have them delivered. Families participating in The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) should have the same opportunity to shop online as other customers.

In September 2020, USDA FNS awarded a cooperative agreement grant to the Gretchen Swanson Center for Nutrition (GSCN) to support the development, implementation, and evaluation of WIC online shopping projects. The first phase of the grant included a systematic collection of information via a Delphi process from WIC-authorized vendor representatives, EBT processors, WIC State agency staff, e-commerce representatives, and other WIC or online shopping experts. GSCN used the Delphi process to inform the first iteration of the Blueprint for WIC Online Shopping published in June 2021. This update to the Blueprint uses new information from the early stages of four online shopping projects that were awarded in 2021 to eight WIC State agencies. Information about the four ongoing projects can be found on the following page and in the "Snapshot of Ongoing Projects" graphic. Additional information about the WIC Online Shopping Grant can be found on the GSCN WIC Online Shopping Website.

This Blueprint can be used to guide WIC State agencies and their partners interested in implementing WIC online shopping. Most of the information in this guide relates to planning and preparing for WIC online shopping projects based on the studies and activities previously discussed. Though WIC online shopping does not have a one-size-fits-all approach, this Blueprint serves as a roadmap for WIC State agencies and their partners as they prepare to implement online shopping options within their jurisdiction. WIC online shopping efforts should occur in collaboration with WIC State agencies, including Indian Tribal Organizations and U.S. Territories. WIC-authorized vendors, WIC local agencies, or other WIC partners should use this guide to help think about their roles and participation in WIC online shopping. GSCN encourages these groups to reach out to their WIC State agency for additional support. The primary audience of this document is the WIC State agencies; however, many of the recommended actions will be completed by partner organizations, in collaboration with the WIC State agencies, and those partners might be referenced where appropriate.

## Offering WIC online shopping for WIC participants may:

**Reduce barriers**, such as long distances to WIC-authorized vendors or lack of transportation.

**Create a positive, simple, and convenient grocery shopping experience** like that of non-WIC shoppers.

**Reduce issues in-lane at checkout**, such as needing to get new items when non-WIC items were accidentally selected or items not scanning appropriately.

# The Online Shopping Projects

## South Dakota and Rosebud Sioux Tribe WIC Programs
**Projected Go Live: Winter/Spring 2024**

The South Dakota and Rosebud Sioux Tribe WIC Programs, along with their partners at Custom Data Processing (CDP), Retail Solutions of America (RSA), Mountain Plains Evaluation, and Maximus will implement WIC online shopping in a regional grocery store chain, Buche Foods. This project focuses on providing online shopping to WIC participants living in rural and remote areas. The online shopping services will initially launch to allow for pick up at the Buche Foods stores in Pine Ridge, South Dakota, which is located on the Oglala Lakota Indian Reservation and in Mission, South Dakota located on the Rosebud Sioux Indian Reservation. After a successful implementation at the initial pilot sites in Winter/Spring 2024, this team plans to expand online shopping to allow for pick up at all other Buche Foods stores and additional WIC-authorized vendors throughout South Dakota.

## Minnesota, Iowa, and Nebraska WIC Programs
**Projected Go Live: Winter/Spring 2024**

The Midwest States WIC Online Ordering Pilot (MSWOOP) partnership includes Minnesota, Iowa, and Nebraska WIC State agencies and aims to create an equitable shopping experience for participants by developing and testing an online shopping and payment solution with regional grocery vendor Hy-Vee and WIC EBT (eWIC) processor FIS/CDP. WIC participants in these states expressed interest in online shopping to overcome transportation and time constraint barriers and to reduce stigma associated with using WIC benefits. The project will begin with one store in Des Moines, Iowa, and expand into Minnesota and Nebraska to meet the modern needs of WIC participants.

## Washington and Massachusetts WIC Programs
**Projected Go Live: Summer 2024**

Washington WIC is partnering with Massachusetts WIC, FIS/CDP, and Walmart to bring online shopping to WIC participants in the two states. An online shopping system for WIC participants shopping at Walmart is expected to go live next year, using Walmart's Online Shopping Platform. The option will be available in both states. Ultimately, this step will help nearly 40,000 WIC families in Washington and nearly 20,000 WIC families in Massachusetts who shop at Walmart access their WIC benefits safely and efficiently.

## Nevada WIC Program
**Projected Go Live: Summer 2024**

Nevada WIC will lead an exploratory project that aims to test the integration of a WIC online shopping system using the WICShopper app. The goal of the project is to create an online shopping solution for vendors that do not have online shopping technology available for their stores and to improve the WIC shopping experience with WIC vendors that are interested in app-to-app integration. By using the already established WICShopper app, vendors would be able to offer easier shopping capabilities for WIC participants. WIC participants will order WIC-approved foods through the app and the app will pass the orders on to participating vendors, currently Save Mart and commissaries operated by the Defense Commissary Agency, for fulfillment. The implementation team for this project includes JPMA, Inc. (the parent company for the WICShopper app), Maximus, FIS/CDP, and Dr. Harry Zhang from Old Dominion University.

# Snapshot of Ongoing Projects

| South Dakota Rosebud Sioux Tribe | Minnesota, Iowa, Nebraska (MSWOOP) | Washington and Massachusetts | Nevada WIC Program |
|---|---|---|---|
| **Project type:** Independent local retailer | **Project type:** Regional retailer | **Project type:** Large national retailer | **Project type:** WICShopper app and offline option |
| *Retail partner:* Buche Foods | *Retail partner:* HyVee | *Retail partner:* Walmart | *Retail partners:* Save Mart, Commissary |
| Estimated Go Live Date: Winter/Spring 2024 | Estimated Go Live Date: Winter/Spring 2024 | Estimated Go Live Date: Summer 2024 | Estimated Go Live Date: Summer 2024 |
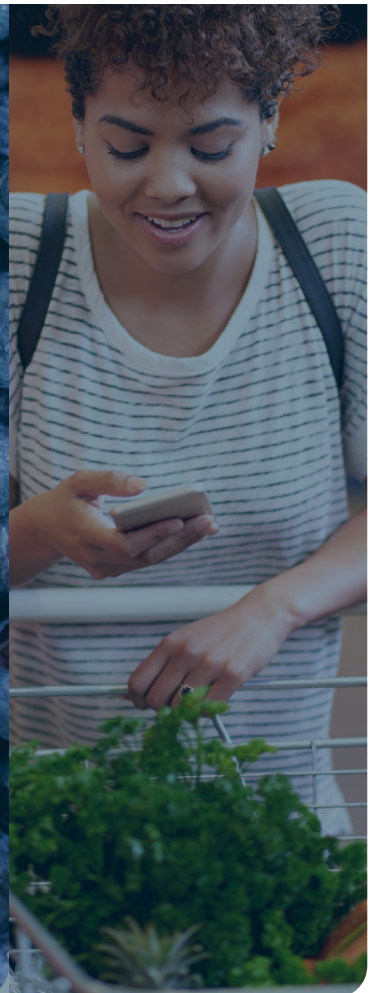
# Key Stages of WIC Online Shopping

The implementation of WIC online shopping projects can be broken into four key stages: Plan and Prepare, Design and Build, Implement, and Maintain. Steps within stages may be iterative and occur in one or more stages. The updates to this Blueprint are based on early lessons learned from working with WIC State agencies designing and implementing WIC online shopping projects. Thus, these updates focus primarily on the Plan and Prepare and Design and Build stages, with some updated information on the Implement and Maintain stages. More details regarding the Implement and Maintain stages will be provided in future Blueprint versions.

## 1 Plan and Prepare

- Determine the scope and scale of the project.
- Assemble a WIC online shopping implementation team.
- Consider federal regulations.
- Explore Management Information Systems (MIS) implications.
- Establish budgets and execute partner contracts.
- Establish a workplan and timeline.
- Establish team communication and collaboration.

## 2 Design and Build

- Coordinate the design and build process for WIC online shopping systems.
- Specify necessary functionality of build.
- Ensure system security and confidentiality.
- Optimize the user experience.
- Develop a process for order fulfillment and provision.
- Develop a training plan.
- Conduct internal and external testing.
- Plan for marketing and education.

## 3 Implement

- Go live with WIC online shopping.
- Monitor and assess.

## 4 Maintain

- Track and measure data and outcomes affiliated with the WIC online shopping projects.

# ① Plan and Prepare

This section provides an overview of key steps that WIC State agencies and their implementation teams (e.g., WIC-authorized grocery vendors, payment processors, e-commerce platform builders, etc.) will ideally complete to begin a WIC online shopping project. The following subsections outline a sequence of activities to consider when planning and preparing your WIC online shopping project. However, in real-world projects, these steps and the suggested activities in each step might overlap, proceed in parallel, or need to be completed in a different order to fit your project.

## 1.1 Determine the Scope and Scale of the Project

While additional partners may be brought on as project needs change, having key project partners on the implementation team and sub-teams identified prior to starting a WIC online shopping project is recommended. Establishing a full implementation team at the earliest project stages gives subject matter experts on the team the opportunity to provide insight into the development of the scope of work to help minimize unforeseen challenges that can delay project timelines or impact budgets. For example, engaging with key partners regarding the flow of information is needed to ensure e-commerce platforms, payment processors, and WIC MIS and EBT technologies can coordinate effectively to complete WIC online orders. WIC State agencies can facilitate discussion around technical requirements and WIC-specific nuances to anticipate timelines and potential sticking points. Involvement of key partners and experts (e.g., WIC-authorized vendors, payment processors, and MIS developers) in the Plan and Prepare stage will help WIC State agency staff plan appropriately for the WIC online shopping project. This should also allow for more precise estimates in the work plan, timeline, and budget.

Determining the scale of the project will be highly specific to the context of each WIC State agency, their project partners, and the overall goals for the WIC online shopping project. WIC State agencies and their partners are encouraged to determine early in the planning process how many WIC-authorized vendors to initially



work with and to determine feasibility and approach for implementation in stores.

The number of WIC-authorized vendors can impact project scope. While other approaches may be feasible, focusing on working with one online platform at a time can decrease the complexity of the project for WIC State agencies new to WIC online shopping.

The way WIC online shopping "roll-out" occurs should also be considered in determining project scale and scope. Some current projects have planned to do a staged roll-out (i.e., first one store, then another store) and others are planning a full-scale roll-out (i.e., all stores for that retail chain at once). A staged approach may involve pilot testing with one store or a few stores within a small region in the state. This approach can reveal issues with technology and/or protocols that can be corrected prior to a full roll-out. A staged roll-out may be more appropriate for WIC-authorized vendors who are new to online shopping or otherwise prefer to pilot their platform and processes prior to a larger scale launch. A full-scale roll-out involves offering WIC online shopping to WIC participants at all stores that use the online platform all at once. A full-scale roll-out may be more appropriate for WIC-authorized vendors that have multiple stores in a state, for projects that are bringing a WIC online platform that has previously been tested in other states to a new state, or for situations with a high degree of confidence in the platform and processes established (e.g., extensive internal testing was conducted). Either approach is acceptable, but each implementation team will need to determine which approach is appropriate for their specific project.

Additionally, WIC State agencies will need to consider how vendor selection for a WIC online shopping project might impact equitable access to WIC. When selecting WIC-authorized vendors to work with, WIC State agencies can consider feasibility (i.e., which vendors are most ready to implement), and the reach of those vendors. The following, and other applicable, questions can be discussed: "Are these stores that our WIC participants prefer?"; "Is there a segment of our WIC population who is not reached?"; "Will offering WIC online shopping at this vendor negatively impact other vendors who are important to WIC access?" For example, in some areas, WIC participants depend on a single or just a few WIC-authorized vendors.

# 1.2 Assemble a WIC Online Shopping Implementation Team

Initiation of a WIC online shopping project represents a multi-partner effort. Assembling a carefully selected implementation team specific to each effort is a crucial step for WIC State agencies. In addition to a larger, higher-level implementation team, some WIC State agencies may also form a smaller implementation team that works on the project daily to focus primarily on priority issues in day-to-day operations. See the tables below and Appendix A for information on each recommended implementation team member, their roles, and the stages they might participate in.

## 1.2.1 WIC State agency Team Members (Table 1-1)
- Representation from WIC State agencies working to implement WIC online shopping could include: State WIC Director(s), WIC Vendor Manager(s), WIC Online Shopping Project Manager(s), IT Project Manager, Business Manager/Analyst, State specific evaluation team members, and WIC Vendor Liaison.
- State agency customer service coordinators or staff dedicated to improving benefit delivery for WIC participants can also be included.

## 1.2.2 Other Team Members (Table 1-2)
- Additional team members include representation from WIC-authorized vendor(s) (see Appendix B for a WIC-authorized vendor planning checklist that WIC State agencies can share with WIC-authorized vendors interested in pursuing WIC online shopping.), MIS developers, EBT processors, technology contractors, and other subject matter experts. Having early and consistent representation from each actor necessary to implement WIC online shopping is important to promote feasibility and avoid blind spots in planning.
- The degree of involvement of team members supporting the WIC online shopping project may vary depending on the stage of each project. However, including these team members early in the planning process and in discussions around project scale and scope will help WIC State agencies develop accurate project timelines and budgets.

## 1.2.3 Optional Team Members (Table 1-3)
- Teams with limited capacity and/or experience in areas such as project management, adopting newer technology, and/or evaluation could consider the inclusion of external consultants and evaluation support.

# Table 1-1. WIC State agency Team Members

| Title | Tasks Specific to WIC Online Shopping |
|---|---|
| **State WIC Director(s)** | • Solicit State leadership support.<br>• Oversee implementation teams and completion of activities.<br>• Develop strategic plan for incorporating online shopping into WIC Program.<br>• Initiate contracting. |
| **WIC Vendor Manager(s)** | • Identify and/or recruit vendors to participate in the project.<br>• Provide insight on requirements and regulations.<br>• Monitor projects for (non)compliance.<br>• Oversee vendor relations.<br>• Develop vendor management policies for internet vendors. |
| **WIC Online Shopping Project Manager** | • Coordinate the contracting process.<br>• Oversee budget and spending.<br>• Create and update workplan.<br>• Coordinate meetings.<br>• Coordinate training plan and material creation.<br>• Oversee deliverable and task completion.<br>• Track project status and health.<br>• Log, assess, and manage risk.<br>• Collaborate with all team members.<br>• Document lessons learned. |
| **IT Project Manager** | • Provide technical oversight during project planning and preparation.<br>• Oversee Design and Build stage.<br>• Develop testing plan and oversee testing phase.<br>• Track issues and document fixes. |
| **Business Manager/Analyst** | • Assist with contract execution, management, and closeout.<br>• Assist with deliverable progress monitoring.<br>• Establish cost tracking and personnel management plans. |
| **State-specific evaluation team members** | • Devise plan for tracking project efficiencies.<br>• Determine metrics for evaluation activities.<br>• Lead evaluation activities.<br>• Incorporate lessons learned into evaluation plan. |
| **WIC Vendor Liaison** | • Support training plan development for local and State agencies.<br>• Implement training plan.<br>• Serve as the direct contact with project vendors.<br>• Monitor projects for compliance. |
| **State Agency Customer Service Coordinator(s)** | • Support training plan and material creation.<br>• Develop or adapt participant satisfaction measures for online shopping project.<br>• Serve as the direct contact for local agencies involved in online shopping project. |

## Table 1-2. Recommended Additional Team Members

| Title | Tasks Specific to WIC Online Shopping |
|---|---|
| **WIC Subject Matter Experts** | • Advise and provide expertise based on subject matter (e.g., WIC local agency staff; IT, eWIC account manager, technology design, or security/fraud experts; retail or vendor experts; policy experts to assist in the review of requirements and regulations; etc.). |
| **WIC-authorized Vendor(s)** | • Advise on system barriers, vendor technology issues, vendor policies, etc.<br>• Participate in design build.<br>• Contribute to training plan design and execution.<br>• Monitor for errors and operational/training adjustment opportunities. |
| **MIS Developer(s)** | • Modify system in compliance with technical requirements as needed to support/integrate online shopping changes.<br>• Contribute to training plan design and execution.<br>• Advise on design build and system changes to implement project.<br>• Participate in design build, testing of the requirements, and defect tracking.<br>• Continuously monitor system changes and provide fixes for defects, hot fixes, etc. |
| **EBT Processor(s)** | • Modify system in compliance with technical requirements as needed to support/integrate online shopping changes.<br>• Contribute to training plan design and execution.<br>• Advise on design build and system changes to implement project.<br>• Participate in design build and testing.<br>• Continuously monitor for errors and provide issue resolution. |
| **E-commerce, web development or other technology contractors** | • Advise on design build and system changes necessary to implement project.<br>• Participate in design build.<br>• Continuously monitor for errors. |

## Table 1-3. Optional Team Members

| Title | Tasks Specific to WIC Online Shopping |
|---|---|
| **External Consultant(s)** | If project management support is needed for the WIC online shopping project, consider contracting with an outside entity with expertise in project management for WIC and other transaction technology implementation. |
| **Evaluation Support** | If evaluation capacity is limited, consider contracting with an outside entity with evaluation experience to monitor and track project effectiveness. |
| **First/Third-Party Platform(s)** | Many WIC-authorized vendors may work with other partner platforms or entities to complete services like fulfilling or delivering online shopping orders or delivery of orders. Depending on the scale of your project, these partners may need to be included in the implementation team. |

## 1.3 Early Considerations for Federal Regulations

There are several possible pathways WIC State agencies and their partners may take to implement WIC online shopping projects. The WIC requirements for online shopping outlined below can assist key WIC partners and collaborators in developing the systems necessary to offer WIC online shopping with internet-based transactions while protecting WIC Program integrity. Importantly, WIC online shopping with offline or in-person transactions (payment at the time of in-store pick-up, curbside pick-up, or delivery) is not included in this section. Therefore, unless otherwise stated, "transaction" refers to "internet-based transaction." Please note, these basic requirements are Federal. There may be additional WIC State agency specific requirements.

### 1.3.1. Federal Requirements

State agencies may request American Rescue Plan Act of 2021 (ARPA) Waivers to support the development and implementation of WIC online shopping projects. WIC State agencies can identify any regulations and technical standards requirements that may pose barriers to project execution and submit related waiver requests to their FNS Regional Office. FNS has also identified a set of waivers that will likely be necessary to support online shopping and mobile pay projects. State agencies should contact their FNS Regional Office early in the project to request waivers. ARPA waivers will remain active until September 30, 2026, or until FNS ends evaluation efforts, whichever is later.

- FNS will consider waivers of requirements in the Code of Federal Regulations (CFR), the Operating Rules Women, Infants and Children Electronic Benefits Transfer (OR), or the WIC EBT Technical Implementation Guide (TIG), as necessary for a specific project.
- WIC State agencies should also review the USDA FNS 2023 Proposed Rule (WIC: Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program) when planning and submitting waiver requests. The Task Force on Supplemental Foods Delivery (the Task Force), WIC Stage agency feedback, WIC participant input, lessons learned from SNAP, and the first iteration of the Blueprint informed the USDA FNS 2023 Proposed Rule.
- The National WIC Association's working group Report on Online Ordering Requirements also provides additional insight on technical requirements to consider.

**Table 2-1** identifies regulations in the CFR and Operating Rules related to WIC online shopping that FNS has waived in support of online shopping projects. Table 2-1 is not an exhaustive list, but rather a starting point for the implementation team to review during the Plan and Prepare stage of their project. For reference, all approved ARPA waivers can be found on the WIC Modernization website. Since a State agency must request a waiver(s), WIC State agencies are advised to consult with their USDA FNS Regional Office about project-specific regulations and requirements.

# Table 2-1. Non-Exhaustive List of Current Federal Regulatory Requirements Related to WIC Online Shopping

| Code of Federal Regulation | | |
| --- | --- | --- |
| **Topic** | **Citation** | **Requirement** |
| **Refunds and exchanges** | 7 CFR 246.12 (h)(3)(ii)(A) | Prohibits WIC vendors from providing unauthorized food items, nonfood items, cash, credit, refunds, or permitting exchanges for authorized supplemental foods obtained with food instruments or cash-value vouchers, except for exchanges of an identical authorized supplemental food item. |
| **Last date of use** | 7 CFR 246.12 (x)(2)(iii) | Requires the last date electronic benefits may be used to obtain supplemental foods to be a minimum of 30 days from the first date. |
| **PIN requirements** | 7 CFR 246.12(h)(3)(vi) | Requires that WIC transactions (including either the signing of a paper food instrument or cash-value voucher, or the entering of a Personal Identification Number (PIN) in EBT systems) occur in the presence of a cashier. |
| **Definitions – Vendor** | 7 CFR 246.2 | Specifically, the requirement in the definition of vendor that each store must have a single, fixed location. |
| **Onsite Preauthorization** | 7 CFR 246.12(g)(5) | Requires State agencies to conduct an on-site visit prior to or at the time of a vendor's initial authorization. |
| **Definitions – Routine Monitoring (On-site)** | 7 CFR 246.2 | Specifically, the requirement in the definition of routine monitoring that requires the monitoring to take place on-site. |
| **Definitions – Compliance Buy (On-site)** | 7 CFR 246.2 | Specifically, the requirement in the definition of compliance buy that requires it to take place on-site. |
| **No Cashier Documented for Compliance Buy** | 7 CFR 246.12(j)(6)(ii)(B) | Requires that for compliance buys, the State agency must document a description of the cashier involved in each transaction. |
| **EBT Operating Rules** | 7 CFR 246.12(bb)(1)(i) | Requires State agencies, contractors, and authorized vendors participating in WIC to follow and demonstrate compliance with operating rules, standards, and technical requirements. |

| EBT Operating Rules | | |
|---|---|---|
| **Topic** | **Citation** | **Requirement** |
| **Voided Transactions** | Operating Rule 4.7.8.3.a | Does not allow for a voided transaction to be used to return or provide a credit for WIC foods. |
| **Returns** | Operating Rule 4.7.8.4.a | Does not allow returns for WIC EBT purchases other than in exchange for the same brand, package size, and type of food. |
| **PIN security requirements** | Operating Rule 9.1 | Outlines specific PIN security requirements. |

## 1.4 Explore Management Information Systems (MIS) Implications

To ensure allocation of adequate time and budget, WIC State agencies should consider if changes to their MIS will be necessary early in the planning stages. Additionally, WIC State agencies using a State Agency Model (SAM) should take into consideration other WIC State agencies in the collaborative, recognizing that timelines may lengthened due to the volume of WIC State agencies involved in MIS changes. Potential MIS changes to consider include messaging and messaging protocols, data exchange formats, and communication and integration between the WIC State agency and EBT processor.

# 1.5 Establish Budgets and Execute Partner Contracts

## 1.5.1 Budget Considerations

Developing a budget for the implementation of WIC online shopping will need to include estimates for work by WIC State agencies, WIC-authorized vendors, EBT processors, and additional contractors involved on the implementation team. The budget will be dependent on WIC State-specific needs, the scope and scale of the project, and the current stage of WIC online shopping (e.g., planning versus early implementation). WIC State agencies will need to develop budget estimates that clearly define both one-time costs and ongoing costs for various aspects of their project. As current projects progress and more information becomes available, future iterations of the Blueprint will include cost estimates.

## 1.5.2 Contracting Considerations

Planning adequate time for contract execution is crucial to minimize project delays. WIC State agencies should consider their state-specific requirements and partner requirements for contracting. Other competing priorities should be identified prior to starting contracts to ensure all parties are informed of contractual needs and timelines. Here are some key contracting factors to consider:

- Ideally, the WIC State agency should prioritize reviewing and approving contracts and amendments. State-level review and approval can be influenced by state budgetary planning and leadership priorities.
- It can be helpful for State agency staff to understand the contracting process in their state, be in regular contact state contracting staff, and proactively identify and address issues that may arise in the contracting process. For example, if a project requires a sole source vendor unique to WIC, planning for and communicating that at the outset of the contracting process may save time and effort.
- State agencies will likely need to consider and make changes to their MIS and EBT processing system(s) prior to implementation of WIC online shopping. Allocating sufficient time at the front end of the project to discuss changes to MIS and EBT processing system(s) can help minimize contracting delays.
- Prior to the contracting phase, it is essential to ask questions about technical requirements to get an accurate budget. See the Specify the Necessary Functionality section for technical considerations necessary for implementation.

- It is advisable for the implementation team to coordinate with procurement and legal counsel to ensure that system and service modifications supporting WIC online shopping are consistent with the State agency's formula rebate contracts and any other contracting and/or legal matters.
- The online shopping projects may be dynamic, and the partners and contracts needed for execution of the project may evolve as the project develops. This can be challenging for state contracting processes that have limited flexibility. State agencies can maintain collaborative relationships with their contracting staff to accommodate changes should they arise.

In contracting with external partners involved with WIC online shopping, WIC State agencies should:

- Identify and discuss other competing priorities prior to starting contracts to ensure all partners have the capacity to execute contracts properly.
- Provide a timeline for sub-contracting and modification to ensure that these external partners can support the project effectively, as applicable. Some WIC-authorized vendors may require sub-contracts to outside entities for development of the WIC online shopping system.
- Request information from WIC-authorized vendors on blackout phases during which new system development work cannot be supported (e.g., particularly busy times such as the holiday season, November–January).
- Determine how issues such as intellectual property or technology transfer need to be addressed in the contract. See Appendix C for sample contracting language around intellectual property.
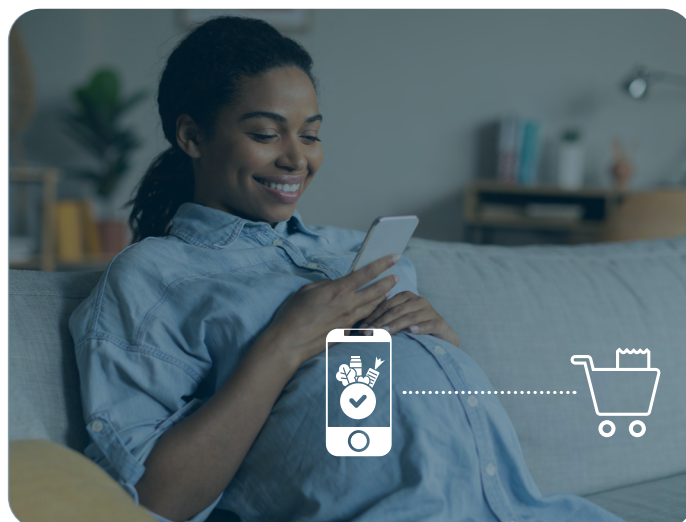
# 1.6 Establish a Workplan and Timeline

A workplan and timeline specific to the online shopping project is useful for effective project management. One recommendation is to split the project's timeline into the stages outlined in this document. The time allotted to each of these stages will depend on various factors, including experience with WIC online shopping, scale of the current project, and the time it takes to establish or update contracts, specify technical requirements, and request waivers, if needed. WIC State agencies may need to include additional requirements and activities as part of their WIC State agencies' rules and regulations that are not listed here. The workplan and timeline should be developed in collaboration with the partners to address the needs of each organization. Below are some additional considerations when establishing the project timeline.

Unexpected delays could emerge due to the following:

- Underestimation of the time needed to finalize and ensure accuracy of technical requirements.
- Changes in timeline due to integration with different MIS providers and/or EBT processors and an increase in the scope for EBT system updates.

- Other external factors (e.g., disasters and supply shortages; holiday pauses for retail partners, etc.), which could limit the capacity of project staff, WIC State agency staff, and/or WIC-authorized vendors as each partner must balance competing priorities, time, and resources.

All partners should discuss competing priorities to account for these in the timeline. Consistent communication with partners about expectations will help to keep the implementation team on track. If needed, a re-launch event to revisit the requirements, work plan, timeline, and expectations can support the implementation team after any delays to the workplan or contracting.

## 1.7 Establish Team Communication and Collaboration

Once the implementation team is established, contracting is completed, and a timeline is agreed upon, implementation teams should establish norms for communication and collaboration. Establishing a group charter, through an inclusive process, can be an approach to formalize group norms and allow members of the group to provide input. Establishing a group charter can be a focus of an initial meeting of the implementation team. The charter can include features such as agreed upon approaches for decision-making and approvals, roles and responsibilities, meeting structure, conflict resolution, and communication. How your implementation team will work together is an important early consideration. Using a sub-committee structure can be beneficial, where smaller groups with relevant expertise meet more frequently to work on pieces of the whole project and report to the full team at regular intervals for feedback and updates. Additional structuring may be beneficial to identify key project tasks and staff members necessary for completing the tasks. One example is establishing a responsible (R), accountable (A), consulted (C), and/or informed (I) or RACI matrix in which key project tasks are identified and team members are indicated by role. Finally, project management tools such as shared online workspaces, project- and task-tracking software, and shared calendars can help facilitate coordination of efforts. Regardless of the approach used, a project management structure should be agreed upon early in the project, implemented, and revisited/revised as needed.

# ② Design and Build

Implementing a WIC online shopping project is a significant undertaking, requiring careful planning, preparation, and execution. To ensure the success of this project, the implementation teams led by the WIC State agencies should have a comprehensive understanding of the technical, logistical, and operational requirements of WIC online shopping. This section provides essential information for WIC State agencies as they lead the implementation team through the design and development process. This stage requires a deeper dive into the technical requirements and iterative design discussions that may require implementation teams to revise scope, timelines, and/or budgets. External consultants with experience in EBT transition or other IT/Technology initiatives may be needed to support WIC State agency staff in this stage. The following sections outline key considerations and best practices for system development, including specifying the system functionality, considering user needs and experience, and conducting internal and external testing.
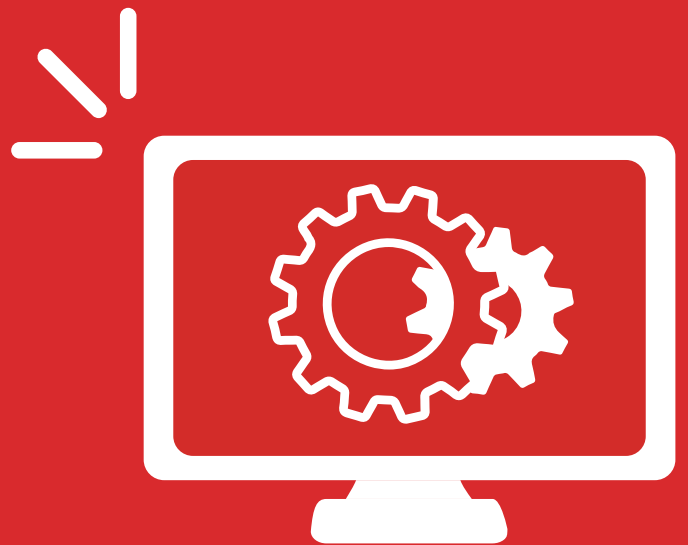
## 2.1 Coordinate the Design and Build Process for WIC Online Shopping Systems

WIC online shopping capabilities can be established in an existing WIC-authorized vendor app or website. There are also options for non-retailer specific apps (e.g., WICShopper) or e-commerce platforms to allow for online shopping at WIC-authorized vendor locations. These options may be particularly helpful for stores that have little or no online presence. In either case, the WIC State agency is responsible for overseeing the design and development of updates to multiple systems and processes to ensure that WIC Program rules and program integrity are maintained. To the extent possible, the systems and processes developed within a single project should be scalable and transferable to aid the integration of WIC online shopping across additional vendors.

### 2.1.1 Specify the Necessary Functionality

In most cases, in order to complete a WIC online shopping order, a web- or app-based platform needs to be able to accept a WIC participant's EBT card information, communicate with their State agency's EBT processor to obtain the WIC participant's benefit balance, cross-reference with the State agency's Approved Product List (APL), communicate with the individual store's inventory database, identify eligible and available WIC items for the WIC participant to select, communicate with the store's fulfillment staff, provide a receipt indicating the WIC participant's remaining balance, and communicate with the WIC participant for order provision.

The following are key considerations that have presented challenges in early pilots of WIC online shopping projects. For further considerations around necessary functionality of EBT, please refer to WIC EBT Operating Rules. While the Operating Rules are not specific to online shopping, they are a starting point for requirements in EBT transactions and are applicable when developing the WIC online shopping systems.

**Authentication**
Authentication for in-store WIC transactions includes a PIN entry by the WIC participant in the presence of a cashier (per 7 CFR 246.12(h)(3)(vi)). However, a cashier cannot be present during online shopping, and so a waiver must be requested to remove the cashier presence requirement. Online platforms commonly have shoppers register an account and store their payments methods. When

registering, WIC participants should be able to store their WIC EBT card as a form of payment, if desired, and enter their PIN number when completing the payment process for their order. These entities should also discuss standards and processes to ensure that any stored WIC participant information remains secure. This is not the only approach to online authentication but may be a method that is compatible with grocery retailers' common approaches for handling online forms of payment. With FNS approval, WIC State agencies can work with their EBT processor to utilize a PIN-less authorization solution that conforms to WIC requirements.

**Approved Product Lists (APL)**
A vendor WIC online shopping platform needs to be able to reference the correct State agency's APL and update the reference lists for each State agency as they change over time (EBT Operating Rules 11). Studies of stakeholders and experiences with early WIC online shopping pilots revealed concerns that can pose challenges to WIC online shopping platforms, including:
- Data quality (e.g., universal product code (UPC) discrepancies that may require human intervention to correct).
- Challenges where UPCs provided by manufacturers for the APL do not comply with retailer point-of-sale (POS) systems.
- Issues related to timing of APL updates because each State agency has its own practices for publishing an updated APL; therefore, retailers must be diligent to download the updated version to ensure WIC participant purchases are approved from

the time items are selected to the time transactions are processed.[1] It is recommended that WIC State agencies work with retailers and e-commerce platforms to consider and address potential issues related to APLs.

## Split Tender

The cash-value benefit (CVB) is a dollar-based benefit used by WIC participants to purchase fruits and vegetables in a variety forms (fresh, canned, dried and/or frozen) authorized by the WIC State agency. When a purchase of a CVB item exceeds the value of CVB benefits remaining, the vendor must allow a WIC participant to pay the difference with another form of payment (i.e., a split tender transaction) (EBT Operating Rules 4.7.3.1). This provision does not apply to the other types of WIC foods as they are quantity, not dollar-based (EBT Operating Rules 4.7.2.1)

## Mixed Baskets

Mixed baskets are orders in which WIC benefits and at least one additional form of payment are being used. WIC online shopping platforms should accommodate these types of orders. For WIC participants who need to purchase other groceries in addition to their WIC items, an online shopping platform that allows for mixed baskets prevents them from having to place two separate orders. When handling mixed baskets, online payment processes must follow the EBT Operating Rules requirement at 4.7.4 that states "…the order of precedence of payment for WIC food items that are eligible for redemption shall be WIC, then Supplemental Nutrition Assistance Program (SNAP), then Temporary Assistance for Needy Families (TANF), then other forms of payment." Ideally, platforms provide the WIC participant with control over how CVB, non-CVB, and other forms of payment are applied to their order, within the framework of the EBT Operating Rules.

## Substitutions and Returns

WIC online shopping platforms will need to include the ability to substitute a selected WIC-approved item for a similar WIC-approved item (i.e., allowable replacement) when the item originally selected is not available. WIC online shopping platforms can display alternatives for WIC participants to choose from and alert the WIC participant to out-of-stock items and when no alternatives are available. At times, WIC items will only be discovered as out-of-stock during the order picking process. Ideally, WIC shoppers would be contacted to approve alternatives or have pre-set preferences saved to their accounts. WIC State agencies should ensure that WIC-authorized vendors only substitute WIC-authorized items if the item selected by the participant is not available.

Additionally, WIC-authorized vendors and payment processors should develop an efficient process for handling returns. It is important to ensure the approach for processing returns from WIC shoppers provides a similar experience to that of non-WIC shoppers (7 CFR 246.12(h)(3)(iii)) and is able to be integrated into vendors' operating systems. Two options have been identified in pilot projects to date:

- Void and Replace: This process occurs when an item is removed from an order for a return, the order is voided, and then re-processed without the returned item (i.e., "void and replace"). The unfulfilled benefit is then effectively returned to the WIC participant's balance.
- Itemize Returns: A line-item deletion approach, as an alternative to the "void and replace" is in development. This approach allows for a WIC-item to be deleted without the need to re-process the remaining items in the order. The unfulfilled benefit is then effectively returned to the WIC participant's balance.

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### When navigating allowable replacements, consider the following:

- Alternative items should be **similar in type, size, and quantity** to the original item.
- The potential for price variations for food items that are typically priced based on weight. Considerations here may include the type of training provided to the store picker who is fulfilling the order.
- Ways to communicate with the WIC participant to receive their approval of the alternative item. For instance, **notifications that prompt shoppers** to choose an alternative item for low inventory items can facilitate benefit redemption, ensure a WIC Approved Product List item is chosen, and increase the range of options for the WIC participant. Allowing replacements could be the default option selected with the WIC participant having the option to change, if preferred.
- Ensure the WIC Approved Product List item is **frequently synced** between current WIC-eligible foods and foods in-stock from the vendor.

[1] Hill, J., Calloway, E., Nitto, A. M., & Anderson-Steeves, B. (2023). Application of a Delphi Technique to Identify the Challenges for Adoption, Implementation, and Maintenance of WIC Online Ordering Across Various Systems and Stakeholders, *Journal of Hunger & Environmental Nutrition*, DOI: 10.1080/19320248.2023.2174827/.; Nitto, A. M., Calloway, E. E., Anderson Steeves, E. T., Wieczorek Basl, A., Papa, F., Kersten, S. K., & Hill, J. L. (2022). State Agencies' Perspectives on Planning and Preparing for WIC Online Ordering Implementation. Nutrients, 14(21), 4447. MDPI AG. Retrieved from http://dx.doi.org/10.3390/nu14214447.

## 2.1.2 System Security and Confidentiality

WIC State agencies can work with WIC-authorized vendors and online payment processors when implementing processes related to online security and protection of WIC participants. WIC online shopping platforms should comply with the current FNS systems/security requirements and guidance as outlined in the relevant CFR, EBT Operating Rules, and/or TIG. Further, several WIC 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 WIC State agency, then established industry standards for systems/transaction security should be followed. Further, 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 CFR, OR, and/or TIG, and must comply with applicable WIC State agency requirements.
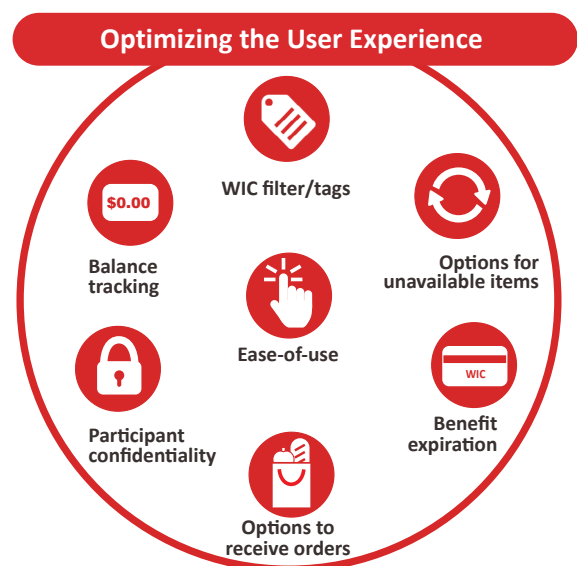
Care should be made to protect WIC participants' personally identifiable information (PII). For example, WIC participants should be opted out of sharing any data or information that is not necessary for completing an online order, executing a transaction, conducting order fulfillment, and/or providing selected items to the WIC participant. Before opting in to sharing non-necessary data, WIC participants must be informed about the online shopping system's security practices and policies (e.g., use of cookies retaining PII and how the cookies can be deleted or avoided). This information should be readily available to the WIC participant in an easily understood format. Personal information such as name, address, phone number, or email address collected by a WIC-authorized vendor must be protected and not provided to any third-party organization without authorization from the WIC participant. Further, confidentiality and stigma are a concern since certain store staff, such as the picker, may know that they are selecting foods for a shopper using WIC benefits. The shopping process should protect WIC participant confidentiality while accurately fulfilling the WIC participant order (e.g., by flagging WIC-approved products). WIC State agencies can work with grocery retailers to establish these protections.

WIC State agencies can establish a process for certifying and monitoring system security standards of platforms that facilitate WIC online shopping to ensure compliance with security requirements. During the design and initial testing stages of WIC online shopping systems, the WIC State agency should develop processes, training, and protocols to ensure basic requirements related to data security and

confidentiality of PII are met. It may be helpful to work with a third-party consulting firm if the WIC State agency does not have this expertise in-house. Additionally, developing guidance for WIC-authorized vendors on messaging to WIC participants on data security, staff training on protection of PII during order fulfillment, and fraud monitoring and reporting can help maintain a consistent approach across vendors. WIC State agencies will need to amend WIC-authorized vendor agreements to include specifications on WIC online shopping security and confidentiality standards. This process may include a review and subsequent adjustments to ensure basic security and confidentiality standards are met as well as potentially adding new processes for WIC vendor reauthorization.

## 2.1.3 Optimizing the User Experience

A central principle to follow when designing the user experience for a WIC online shopping project is that the WIC shopper's experience should be as identical as possible to a non-WIC shopper's experience. However, there are inherent limitations associated with utilizing WIC benefits compared to other forms of payment (e.g., only WIC approved items are eligible). Limitations aside, an equitable shopping experience for WIC participants should be a primary goal and will ultimately benefit the WIC-authorized vendor as well. This requires consideration at every step of design and development of an online shopping project, especially when reviewing the technical requirements and workflow of the WIC online shopping platform. Some key considerations for ensuring an equitable experience for WIC participants include language accessibility, internet/email access, stigma, benefit timing, and optimization of the customer experience.



**Optimizing the User Experience**

- WIC filter/tags
- $0.00 — Balance tracking
- Options for unavailable items
- Ease-of-use
- Participant confidentiality
- Benefit expiration
- Options to receive orders

**Language Access**

Projects should consider languages other than English when developing user interfaces and educational materials for WIC online shopping. WIC State agencies, local WIC agencies, and WIC-authorized vendors can work together to identify the most relevant languages to consider for specific geographic areas.

**Internet and Email Access**

While many WIC participants have internet access and experience with web-based platforms, some may not, especially in areas with limited broadband availability. WIC State agencies and WIC-authorized vendors should work together to help address these limitations. For example, WIC clinics could offer a kiosk where WIC participants can place and advance schedule online orders. Having multiple ways for WIC participants to register on WIC online shopping platforms could increase access to WIC online shopping. Allowing a phone number and/or providing help to set up an email account either in store or in clinic can help mitigate this barrier.

**Stigma**

The WIC-authorized vendor's ordering process, staff training, and communication between the WIC online shopping platform and fulfillment staff should balance WIC participant confidentiality with the ability to accurately fulfill the WIC participant order (e.g., by flagging WIC-approved products). Ideally, the status of a grocery order as a "WIC order" should only be known to store staff that need to know that information (e.g., an order picker might need to know to communicate with a shopper about allowable replacements, and therefore, needs to know it is a WIC order), while other store staff (e.g., those providing online orders to customers at curbside) do not need to know it is a WIC order. For example, WIC-authorized vendors should take care to ensure grocery bags and receipts do not identify the grocery order as a "WIC order."

**Benefit Timing**

For WIC online shopping projects utilizing in-person transactions (e.g., via a card reader at curb-side pick-up), the timing from order selection to transaction processing may be elongated compared to in-person shopping. Assuming online orders with in-store/curbside can be placed in advance of the date of pick-up and transaction, this presents the possibility that benefits could expire from the time the order is placed to the time the transaction occurs. For projects utilizing in-person transactions, this scenario should be considered by the WIC State agencies and their implementation team and accounted for, such as ensuring that the participant is only able to select times for payment and pick up that are within their benefit

availability, with flexibility for the State agency and vendor to correct any issues.

**Enhancing the Customer Experience**

WIC State agencies and WIC-authorized vendors can collaborate when developing or modifying the WIC online shopping platforms to make WIC participants' shopping experience as seamless and user-friendly as possible. Including WIC participants in the planning, development, and testing of WIC online shopping approaches and platforms can help ensure their needs are met and may promote uptake. WIC participants can be included through activities such as surveys and focus groups to provide feedback. Additionally, WIC participants could be included on the implementation team or in an advisory role. WIC participants could also pilot solutions prior to projects "going live" or provide feedback during/after the trial run. In addition to what is learned from the WIC participants, see below for some examples of features WIC-authorized vendors and their online shopping platform can consider for optimizing WIC participants' shopping experiences.

- Easy filtering and identifying eligible WIC items: An intelligent filter could display products based on both the relevant APL and the household's current benefit balance, indicating types and quantities for each food category and subcategory. Additionally, WIC-approved items should be easily identifiable. Systems that nudge a shopper to log in prior to selecting items allows the platform to identify the correct APL and to access the correct in-store inventory.
- Control of WIC benefit allocation: Allowing WIC participants to allocate CVB and non-CVB benefits for their order as they see fit, rather than benefits being automatically applied to eligible items.
- Auto-populate past WIC items: Providing WIC participants with the option to easily identify and auto-populate their most recent WIC order and or frequently selected items can make their shopping experience more efficient.
- Timely reminders: Reminders in the WIC online shopping platform such as notifying WIC participants of unused benefits and/or upcoming benefit expiration support full benefit redemption.

**Vendor Experience**

WIC State agencies are encouraged to build working relationships with vendors. The managers and staff (such as online order pickers) of WIC-authorized vendors participating in online shopping projects will be end-users of the WIC online shopping platform as they fulfill orders and support WIC customers. WIC-authorized

vendor partners can design systems that integrate with existing online shopping procedures that are not overly burdensome or cost-prohibitive for WIC-authorized vendors. Including WIC-authorized vendors in the planning and design process to understand their needs and preferences can help ensure solutions developed are viable for vendors. For example, vendors may have specific needs or preferences around how substitutions are handled (void and replace versus line-item deletions) or around how store inventory levels are communicated and reflected in the online shopping system. Collaboration with vendors will aid in establishing an initial partnership and long-term engagement.

## 2.2 Develop a Process for Order Fulfillment and Provision

Once orders are placed through a WIC online shopping platform, the orders need to be filled and provided to the WIC participant. A WIC online shopping platform will need to communicate with fulfillment employees. Those employees may need training on handling WIC orders and the ability to communicate with the WIC participant for order modifications (e.g., substitute an out-of-stock item, updates on a pickup/delivery time, etc.) using industry standards. WIC participants will need to be able to select their preferred way to receive their order if multiple

options exist (e.g., delivery versus pick-up) and be notified when their order is ready. Ideally, the process for WIC online order fulfillment is essentially identical to non-WIC order handling and integrated within the same overall processes at the retailer.

The primary models for providing filled orders to WIC participants include some form of curbside pick-up and delivery. Curbside pick-up is when a customer drives to a retail location to collect their order. Approaches may involve designated parking spots or drive-up stations, for example. The WIC participant will need a way to notify the store staff that they have arrived for their order, such as via messaging through the WIC online shopping platform, and a way to identify their order (e.g., a unique order number displayed through their phone app). For order delivery, this is not only convenient for customers in general, but also helps address transportation barriers faced by many WIC participants. While feasibility of delivery is a concern (e.g., especially in rural areas) due to staffing requirements and logistical issues, third party delivery companies may be able to fill this need. WIC State agencies can consider developing policies on fees associated with WIC online shopping, pick-up, or delivery, and that any applicable fees be clearly communicated to WIC participants before the order is placed. Also, many WIC items are perishable, so care should be taken to ensure food safety standards when holding orders for pick-up and delivery.

## 2.3 Develop a Training Plan

Training will be necessary for anyone who will be interacting with WIC participants for their WIC online shopping order. Particularly, training is important for vendor staff that may be handling WIC orders and helping to troubleshoot issues, and for WIC clinic staff that may be introducing WIC online shopping to participants and fielding questions.

Adequate training for the store staff, especially for pickers and those who may be responsible for troubleshooting customers' online shopping platform issues, can have a significant impact on the project's overall success. The staff's ability to support and assist WIC participants with their online shopping experience is a critical component of successfully



What training is needed for WIC State and local agency staff?

What training is needed to support order pickup and delivery?

What training is needed to support WIC participants during online shopping?

What training is needed for store staff to fulfill online orders?

implementing WIC online shopping. Store staff training should cover topics such as navigating the online shopping platform from the perspective of a WIC shopper's experience, assisting participants with any technical issues, answering common questions, and identifying and communicating allowable replacements when fulfilling WIC online orders.

WIC local agency staff also play a key role in the successful implementation of the project as they occupy a unique spot between development of the project and interaction with WIC participants. Increasing local staff's knowledge and confidence with resources will help them feel prepared to educate and assist WIC participants, potentially leading to better uptake of the WIC online shopping. WIC staff will need to be trained on: the basics of WIC online shopping and what it allows WIC participants to do; general concepts and approaches common among WIC online shopping platforms (especially those used by local WIC-authorized vendors), including how to sign-up and complete orders; how to respond to common questions and issues WIC participants may have; and when questions should be directed to the specific vendor.

Prior to developing new training, State agencies should review their current training(s) with special attention to any unique and relevant aspects of online shopping that may need to be added. Overall training plans should identify vendor and WIC roles that need training, appropriate timing and sequencing of training given project roll-out, and the content of training. Additionally, because training can be time intensive, an approach that is efficient and sustainable (e.g., videos and accompanying reference material) might be desirable.

## 2.4 Conduct Internal and External Testing

Once the technical and design features of the WIC online shopping platform are established, it is time to test them. Prior to providing online shopping to WIC participants, end-to-end testing in the online production environment with the WIC State agency or their designee needs to be completed. The process includes testing between the WIC-authorized vendor system and the EBT processor, and between the EBT processor and the State agency's MIS, followed by user acceptance testing. Once the initial testing is completed and successful, the online shopping feature can be offered to WIC participants. Also, it may be advantageous to pilot the developed WIC online shopping process, including the web-based platform, order fulfillment and provision training, and marketing and education at one store first (or a collection of stores in a particular area). In this way, issues can be identified and addressed before WIC online shopping is rolled out statewide.

Approaches to testing can vary depending on the site and team's needs or resources. Some recommendations include:

- Establish and complete cycles of internal testing. Determine the length of each cycle (e.g., three weeks) and include a resolution period before the next cycle begins to fix errors. Additionally, having weekly defect triage meetings can ensure each partner is up to date and understands any issues.

- Include a team to create test cases based on project requirements and design documents. A test case can be used as the backbone of future testing that will incorporate different testing levels with the WIC-authorized vendor and WIC State agencies, ultimately leading to a full user acceptance test (UAT).

- Leverage lessons learned from WIC State agency EBT implementations to inform the testing approach. However, it should be noted that test cases used for EBT implementation may or may not work well for WIC online shopping testing. Pilot projects indicate that WIC online shopping testing often requires WIC State agencies to develop additional test cases for each level of testing. Future iterations of the Blueprint will include example test cases.

- Include project team members that will be developing training materials in the testing process and triage meetings, when appropriate, to help collect and flag items as potential training topics.

- Collaborate between WIC State agencies and all project partners. One defect has the potential to disrupt multiple entities, which is why including all partners in the testing process is important.

## 2.5 Design a Plan for Marketing and Education

WIC State agencies and their implementation teams should develop plans to promote WIC online shopping availability and provide WIC participants with education about this opportunity. The two primary locations to target promotional efforts might include the WIC clinic and grocery retail locations participating in WIC online shopping. Additionally, other locations that WIC participants and prospective WIC participants frequent may be advantageous locations for marketing. Implementation teams should work closely to design a cohesive messaging approach that clearly articulates the main elements of this opportunity. Ideally, marketing approaches include both physical marketing materials (e.g., posters, brochures, merchandise, etc.) and virtual elements (e.g., social media marketing campaigns, banner ads on store websites, etc.). Also, coordination with local members of the media, such as kick-off events in which members of the media are invited, interviews on morning radio, and press releases can serve to broadly disseminate messages. Once WIC participants and the public (including potentially eligible non-participants) become aware that WIC online shopping is available, they may begin asking WIC clinic staff and store staff how they can participate. Developing a cohesive approach (including informational materials and talking points) to educating WIC participants about WIC online shopping and how they can participate will be crucial. Members of the implementation team, especially WIC local agencies and participating local WIC-authorized



vendors, should coordinate their marketing and educational efforts (e.g., branding, activities, messaging, etc.). Further, the recommended process for developing the marketing and education plan includes input and suggestions from a diverse set of WIC participants who may know best how WIC participants prefer receiving information.

| Tips for Successful Education and Outreach to WIC Participants Include: | | | | |
|---|---|---|---|---|
| **Outreach Resources** | **Customer Training** | **Tip Sheets** | **Staff Training** | **Accessibility** |
| Utilize existing outreach resources familiar to WIC participants such as text, social media, newsletters, and WIC appointments. | Create "how-to" videos for customers and host them in the app or web platform. | Provide participants with tip sheets on how to use the app or web platform. | Consider training store staff to answer questions related to WIC online shopping. | Consider needs of WIC subgroups, such as those with limited English proficiency or person(s) with disabilities. FNS can be a useful resource for technical assistance to ensure resources are accessible. |

# ③ Implement

The Implement stage begins when WIC participants can order WIC-approved food items online. Successful implementation requires ongoing efforts by the implementation team. At this point, the activities for the WIC State agencies and their implementation teams transition from the Design and Build stage to active monitoring. Early implementation activities include monitoring WIC participant engagement and usage of online shopping along with trends in benefit redemption rates, identifying and resolving problems with the online shopping system and sustaining communication with staff, partners, and WIC participants.

## 3.1 Go Live with WIC Online Shopping

"Go live" dates refer to the point in time at which WIC participants will be able to begin placing online orders. The number of stores involved in the project and the State agency and/or vendor's level of previous experience with WIC online shopping will have a significant impact on how quickly a project can "go live." Clearly defined milestones for online shopping platforms, including successful UAT should be agreed upon among partners in the implementation team, documented in the workplan, and reviewed regularly. Beyond system functionality, milestones should be established for marketing and promotion, WIC participant awareness and education, and staff training. It may be advantageous to use a staged approach if WIC online shopping is new to a state and/or new to a specific WIC-authorized vendor. Such a staged approach could include a "staged roll-out" in which WIC online shopping is piloted for one store or a smaller number of WIC participants. A staged roll-out allows the opportunity to evaluate issues with the online platform, identify training and education needs, analyze marketing efforts, and may help predict demand. See section 1.1 for detailed guidance on determining the scope of the project roll-out. Once the implementation team feels comfortable based on testing and/or piloting of key features of the WIC online shopping approach, WIC online shopping can be opened to WIC participants.

## 3.2 Monitor and Assess

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. Implementation teams should designate a team member as the point of contact for issues and establish a triage system for addressing problems. This point of contact may differ depending on the characteristics of the issue. For example, if an error arises 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-authorized vendor's online shopping system and/or given to WIC local agencies to provide to WIC participants.

While a formal evaluation of the implementation of the WIC online shopping project may not always be feasible, considerations around specific outcomes are necessary to ensure the project is working as intended. Implementation teams may consider tracking the following process outcomes: uptake and participation, order errors and error types, rates of substitutions and returns, and the rate of completed transactions. In addition, implementation teams may track implementation (e.g., key milestones, outputs from planned project activities, training, etc.) and ongoing cost, such as the cost associated with implementation and maintenance for the various systems (e.g., WIC State agencies, WIC-authorized vendor) and the types of costs (e.g., human resources, technology). Tracking these processes and their respective solutions, including adjustments or modifications to the online shopping system and/or processes, will allow for early identification and resolution of problems.

Brief, regularly scheduled check-ins among the WIC State agencies and their implementation teams 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 (e.g., to change a process for fulfilling an order) or lead to larger modifications of the project that require more discussion and logistics planning (e.g., changing how allowable replacements are handled).

Lastly, during the Implementation stage, WIC State agencies will need to develop processes for long term implementation, which includes ongoing compliance activities specific to the online shopping option. Areas for action may include monitoring functions such as fraud detection, use and maintenance of State APLs in online shopping systems, and considerations for MIS data and reports specific to online shopping. Projects may provide WIC State agencies and their partners the opportunity to create new processes that streamline administrative functions and maintain program integrity.
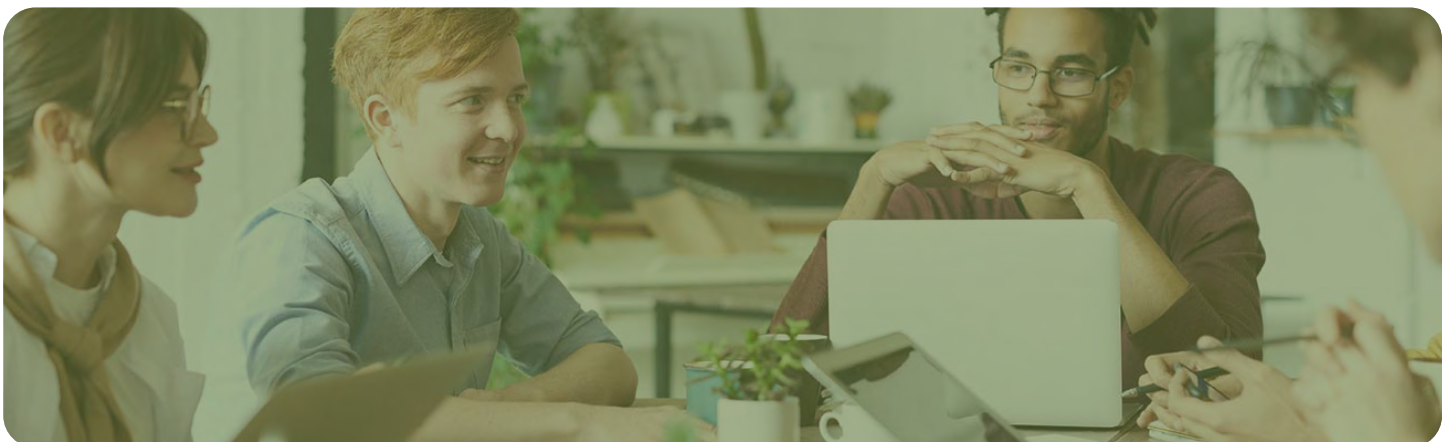
# ④ Maintain

WIC online shopping projects require investment by WIC State agencies, WIC-authorized vendors, and other WIC community members. Ideally, during the Maintain stage online shopping projects will be improved and expanded over time to align with advances in online grocery shopping technology. Like other emerging technologies, WIC shopping systems will need to be monitored over time and regularly updated to stay relevant and useful to WIC participants. Understanding the ongoing maintenance activities and the resources necessary to sustain those activities is essential for long-term sustainability.
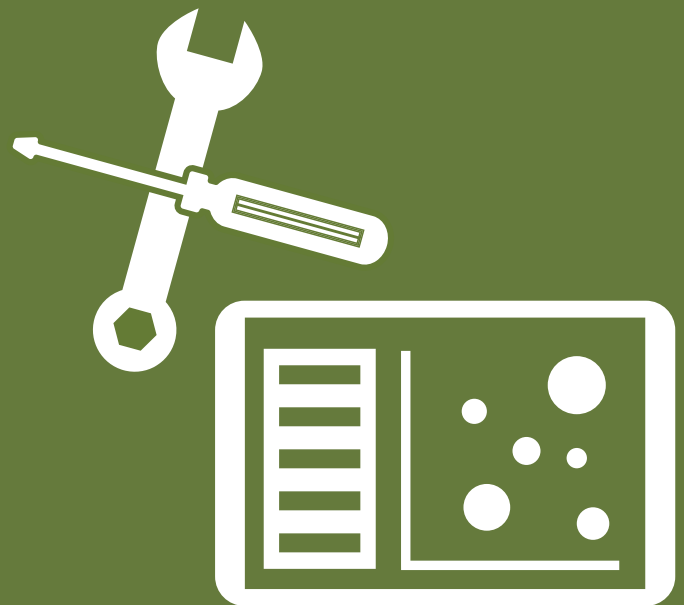
# 4.1 Maintenance of WIC Online Shopping

State agencies should:



- **Track and measure data and outcomes** affiliated with the WIC online shopping projects to ensure the projects are running optimally for as long as possible. Consider low-burden data collection efforts to accommodate WIC participants, WIC State agencies, and WIC-authorized vendors.

    o For example, continually monitoring online shopping uptake, usage, and benefit redemptions rates may clarify if adjustments are needed to maintain WIC online shopping.

    o Other vital pieces of information to monitor related to project feasibility and maintenance include the amount of time that WIC staff and other implementation team partners spend supporting online shopping and the costs associated with maintaining WIC online shopping (for State agencies and vendor partners). Future versions of the Blueprint will provide more detailed information on the time and implementation costs of WIC online shopping programs.

- **Develop processes specific to WIC online shopping** that meet WIC State agency requirements for the routine monitoring and authorization of WIC-authorized vendors.

- **Share findings and plans** to expand the scope and scale of the projects with WIC online shopping partners and community members.

- **Identify short-term and long-term goals** for improvement of processes and the potential to increase reach and impact of their online shopping projects. Continue to consider equitable access, including the size and types of participating WIC-authorized vendors as well as the geographic reach of projects.

- **Evaluate the implementation team**, such as what key roles and responsibilities are needed to sustain WIC online shopping projects. This may include condensing project roles and transferring them to long- term sustainable positions (e.g., WIC online shopping project management duties moving to Vendor Manager responsibilities, WIC State agency evaluation teams continuing to monitor WIC online shopping outcomes).

- **Continue communication** on the WIC online shopping project across implementation team members.

# ⑤ Conclusion

The Blueprint provides guidance on how to approach the four stages of a WIC online shopping project: Plan and Prepare, Design and Build, Implement, and Maintain. Additional considerations, lessons learned, and best practices from the four USDA-FNS funded projects and other projects will be added to this Blueprint as available. The sharing of this information will strengthen current and future WIC online shopping projects and improve the ability of WIC participants to order their groceries using online shopping systems.

# 5.1 Where to Find Additional Information

In addition to the information provided in this Blueprint, the following resources could be helpful in starting a WIC online shopping project:

**Gretchen Swanson Center for Nutrition's WIC Online Shopping website** contains up-to-date information on currently-funded WIC online shopping projects. Additional materials will be provided as they become available.

**USDA FNS' website for WIC Modernization**, specifically **Improving the Shopping Experience** provides information on the key activities towards improving the shopping experience for WIC participants by expanding online shopping

- The USDA Proposed Rule titled, WIC Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program, was released in February 2023 and provides additional insight to the proposed ways to enhance WIC online shopping.

**USDA Report on the WIC Task Force on Supplemental Foods Delivery** outlines the results of the Task Force's assessment on next steps for streamlining the redemption of WIC benefits in a manner that promotes convenience, safety, and equitable access.

**The National WIC Association's working group Report on Online Ordering Requirements** provides additional information on the necessary steps to scale up online shopping options in WIC.

# Appendices

## Appendix A
Implementation Sub-team Structure

### Technology Integration Team

Design and develop online system; oversee system integration with MIS, EBT, and third-party payment processors (if applicable)

**Recommended Members**
WIC Vendor Manager(s)
IT Project Manager
Vendor Representative(s)
Payment Processor(s)
MIS Developers and EBT Processors

### Policy Team

Review policies, regulations, and rules that apply to WIC online shopping

**Recommended Members**
State WIC Director(s)
WIC Vendor Manager(s)
Business Manager/Analyst
WIC Subject Matter Expert(s)

### Vendor Team

Manage and oversee vendor operations for WIC online shopping; assist with development of training plans

**Recommended Members**
WIC Vendor Manager(s)
WIC Online Shopping Project Manager
Vendor Representative(s)
WIC Subject Matter Expert(s)

### Evaluation Team

Develop evaluation plan and track metrics

**Recommended Members**
State Specific Evaluation Team Members (e.g. Epidemiologist, WIC Program Evaluator, etc.)
WIC Online Shopping Project Manager
Vendor Representative(s)

# Appendix B

## WIC Online Shopping Planning Checklist for WIC-Authorized Vendors

✓ **Assign a point of contact with decision-making power to the WIC online shopping planning team.** It is important to have someone on the team who has the authority to make decisions regarding the implementation of WIC online shopping. This person should have the power to make decisions, communicate with partners, and address any issues that arise during the Plan and Prepare and Implement stages.

✓ **Coordinate regular touchpoints with WIC State agencies.** Regular touchpoints ensure everyone is on the same page and that the WIC State agency can offer needed guidance/support.

✓ **Open lines of communication with all WIC online shopping partners early in the Plan and Prepare stage.** Effective communication is essential to the success of any project, and the WIC online shopping program is no exception. It is important to establish open lines of communication with all partners, including WIC State agencies, technology partners, and payment processors, to ensure everyone is aware of the project's goals and requirements.

✓ **Discuss important issues with WIC State agencies.** It is essential to engage in discussions with the WIC State agency to ensure that the WIC online shopping project meets all necessary regulations and requirements. This includes discussing specific regulations related to the WIC Program, contingency plans in the event of item shortages, options for allowable replacements, staff training requirements, participant education, and tracking error rates.

✓ **Keep tracking online shopping proposed rule process.** The proposed rule was designed to provide greater flexibility and convenience for WIC participants, while also ensuring that the integrity of the WIC Program is maintained. The proposed rule is still in the review process and may be subject to changes before finalized.

| Considerations for Each Type of WIC-Authorized Vendor | | |
| --- | --- | --- |
| **National** | **Regional** | **Local** |
| Work closely with the WIC State agency to ensure compliance with state-specific requirements for each state where a store will offer WIC online shopping. | Work closely with the WIC State agency to ensure compliance with state-specific requirements for each state where a store will offer WIC online shopping. | Work closely with the WIC State agency to ensure compliance with state-specific requirements. |
| Communicate with the WIC State agency about differences in operations between locations (e.g., delivery/pick-up differences between stores). | Communicate with the WIC State agency about differences in operations between locations (e.g., delivery/pickup differences between stores). | Work to streamline online systems to minimize development and maintenance costs. |
| Meet early in the project with each WIC State agency's EBT processor to discuss payment integration processes. | Meet early in the project with each WIC State agency's EBT processor to discuss payment integration processes. | Partner with third-party vendors who have experience implementing SNAP online or WIC online shopping. |
| | Work to streamline online systems to minimize development and maintenance costs. | |

# Appendix C
**Sample Contracting Language for Intellectual Property**

As between [WIC State agency and partner name], [WIC State agency] will own all right, title, and interest in and to, including all intellectual property rights associated therewith in all technology it develops in connection with the Grant Purpose under this Agreement (the "Work Product"). Notwithstanding the foregoing, any intellectual property ownership, or rights, including without limitation the Work Product, are subject in all respects to the Program Requirements, including but not limited to, 2 C.F.R. 200.315 and 2 C.F.R. 200.313(e).