Appendix H: Public Comment 4

Comment Number: FNS-2022-0015-1357-0004

All Sections: 4.3, 5.2.10.1.1

Classification: Substantive

Commenter Type: WIC EBT Processors

Organization: Forage

Excerpt Text: To further accelerate enabling WIC online for retailers, USDA could consider a new certification and authorization process for vendors. For online platforms, for instance, a platform that has received USDA and WIC State Agency authorization for one of its merchants can bring WIC online acceptance to all of its merchants, immediately enabling retailers to begin transactions. This heavily reduces administrative costs (for State Agencies to individually approve merchants), and significantly increases access to WIC online for recipients nationwide. For merchants (i.e., "Internet Vendors" and "Online Only Vendors") with a franchisee model, this proposal would also help them more easily launch WIC online and serve more recipients.

- Retailers would still be accountable to the USDA under this new authorization framework (i.e., certifying compliance with federal requirements and laws).

- Creating a certification for online platforms to assist retailers with online transactions will not only expedite the process but is also consistent with the statutory independence granted to WIC state agencies.

- As with all other WIC certifications, WIC state agencies would maintain responsibility for setting criteria and certifying online enablement platforms within the framework of federal law and regulations.

- WIC state agencies would also retain oversight to ensure programmatic integrity and prevent waste, fraud, and abuse.

We further suggest that USDA consider waiving any duplicative online configuration and testing requirements for previously approved enablement platforms. This would allow retailers to accept WIC transactions online more quickly, by reducing the administrative burden on WIC state agencies.

The ultimate goal should be to not only accelerate online grocery shopping capabilities for WIC participants as quickly as possible, but also ensure the integrity of the program. In the section below, we go into more detail on the latter portion.