

WIC ONLINE ORDERING AND STORE PICK-UP GUIDANCE FROM FNS

FMI recently inquired with FNS regarding grocer's ability to provide online ordering and store pick up for WIC customers. FNS responded that online ordering with in-store pick up is allowable provided that:

- WIC does not pay any fees for this service.
- Prices in the online store are the same as the in-store prices that were used to screen for WIC vendor authorization.
- Transactions occur in front of a cashier (and all other transaction requirements are met).

FMI followed up with FNS asking for further clarification on these points. FMI's questions and FNS' questions are below. We hope you find these helpful.

1. With regards to the pricing being the same in-store as online and reflect what was used for vendor authorization. That makes sense, but what if store's run promotions between Sundays to Sat. What if the customer places the order online on a Friday, and the price is one thing, but does not schedule a pick up until Monday, where the price may have gone up or down both online and in store?

FNS response: The vendor must handle price changes in the same manner that it would handle them for non-WIC customers. Your response that vendors charge the prices posted on the day of pickup is acceptable. Ultimately, the WIC authorized vendor must offer WIC program participants, parents or caretakers of infant of child participants, and proxies the same courtesies offered to other customers, and this is no exception.

2. Additionally, how does FNS view cash value vouchers online where they may order 1lb of banana's but get .9lbs? Would that be a problem? Even if they are charged for .9? What if it went over? 1.1lbs? And that exceeded the cash value?

FNS response: We would prefer for this question be posed to the WIC participant at the time they place their order, so the participant has the option to select their preference. A maximum over/under value should be selected and provided to participants (we assume stores have a policy related to this for other online customers—the same standard should be used for WIC customers). This is particularly important in State agencies that use paper food instruments since the participant would lose any unspent benefit.

Sample language for WIC customers purchasing items that must be weighed for pricing:

“We are unable to provide the exact weight selected, but will provide a weight within [insert ounces, e.g., .25 ounces], would you prefer that we weigh your items and provide:

A) Slightly less than the full amount or

B) Slightly more than the full amount, with the option to use a different form of payment if your WIC benefit balance is exceeded.”

4. Regarding the third bullet point, where the “transaction occurs in front of the cashier” would that include a store associate who is processing the transaction at the customer’s car, or otherwise outside of the store? Is this written to mean no self-check-out or kiosk check out?

FNS response: All WIC transactions must take place in the presence of a cashier per federal regulations. In transactions that are completed at the customer’s car or via self-checkout/kiosks, the store associate at the car or overseeing self-checkout/kiosk transactions is acting as the cashier. This associate should be trained in the same manner that the vendor trains all cashiers on WIC transactions.

Since self-checkout is allowed at State agency option, vendors should check with their respective State agencies to ensure that all transactions follow any guidelines that have been established (for both pure self-checkout/kiosk transactions and hybrid online ordering with self-checkout/kiosk payment transactions).