DATE: November 16, 2026

SUBJECT: WIC Policy Memorandum #2027-3: Implementing the *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program* Final Rule

TO: State FNA Staff
Community Nutrition Programs
State Support and Evaluations

WIC State Agency Directors
All State Agencies

On November 6, 2026, the Food and Nutrition Administration (FNA) published the *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program* final rule in the Federal Register (91 FR 70250) (final rule). The final rule supports State agency innovation and modernization, while safeguarding program integrity. The updated provisions allow for the use of new technologies to improve the WIC shopping experience while increasing access to healthy foods for WIC participants.

This memorandum outlines timelines and expectations for State agencies to implement the final rule. State agencies should reference "WIC Policy Memorandum #2027-4: Sunsetting Waivers in Response to the *Special Supplemental Nutrition Program for Women, Infants, and Children (WIC): Online Ordering and Transactions and Food Delivery Revisions to Meet the Needs of a Modern, Data-Driven Program* Final Rule" for information on sunsetting waivers.

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I. IMPLEMENTATION TIMELINES

The final rule is effective December 7, 2026. The deadline to implement most provisions is February 4, 2027, 90 days from the date of publication, with one exception that is due by November 6, 2028, 24 months from the date of publication. The table below summarizes these timelines, key provisions of the rule, and which State agencies are required to implement each provision. The following sections provide further implementation details, and Appendix A provides a complete listing of the final rule provisions for reference.

Table 1. Overview of Final Rule Provisions and Implementation Timelines

Affected State Agencies	**Key Provisions***	**Implementation Timeline**
All	• Transaction authentication policy • Shelf price collection • Remote benefit issuance • Vendor agreements • Farmer and farmers' market agreements	On or before February 4, 2027.
With online shopping projects**	• New vendor types • Virtual oversight	On or before February 4, 2027.
With online shopping projects**	• Return of electronic benefits • Last date of use for returned electronic benefits	On or before November 6, 2028.
Using mobile pay**	• Multiple food instrument types	On or before February 4, 2027.
With a home food delivery system.	• Home food delivery options	At State agency option.

* Some provisions in the final rule do not require any immediate operational or administrative changes for State agencies and are therefore not included in this table. Please see Appendix A, Table A.3. for a review of those provisions.

** State agencies using modernization options such as online shopping, virtual oversight methods, or mobile pay at the time of publication must implement on or before the deadline to be in compliance with updated regulations. However, any State agency may choose to implement on their own timeline after the rule becomes effective.

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II. GENERAL IMPLEMENTATION EXPECTATIONS

Per 7 CFR 246.4(a)(14), the State Plan must include a description of the State agency's food delivery system. The final rule affects State agency food delivery operations. State agencies must therefore submit any necessary State Plan amendments, policies, and procedures to FNA for approval no later than the associated implementation deadlines.

FNA will provide State agencies with a checklist to facilitate this process for State agencies. State agencies must prepare any necessary updates to food delivery system policies, procedures, and the State Plan no later than the dates provided in this memorandum. However, State agencies are not required to submit the checklist itself. Appendix A, which outlines all final rule provisions for reference, also identifies the relevant checklist sections for each provision to assist WIC State agencies in making necessary updates.

As a reminder, State agencies are required to notify vendors of changes to regulations, policies, and procedures governing the program before changes are implemented (7 CFR 246.12(h)(7)). Further, prior to implementing any program changes, State agencies should develop communication and training plans, when appropriate, for all stakeholders affected by the final rule change.

III. REQUIRED CHANGES FOR ALL STATE AGENCIES

This section summarizes the provisions in the final rule that apply to all State agencies and the resulting changes to food delivery operations. The deadline to implement the following provisions is February 4, 2027, 90 days from the date of publication, although State agencies may implement provisions beginning on December 7, 2026, when the rule becomes effective.

- **Transaction Authentication Policy:** WIC shoppers are no longer required to enter a personal identification number (PIN) in the presence of a cashier to complete a WIC transaction. To ensure the continued security of WIC

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transactions, each State agency must develop a transaction authentication policy. Please see Appendix B for sample policy language.

- **Remote Benefit Issuance Policy:** State agencies may issue EBT cards and electronic benefits remotely under any circumstances. Each State agency must address remote issuance in their plan to improve access to the program and establish procedures to ensure receipt of mailed EBT cards by the intended recipients.
- **Shelf Price Policy:** State agencies are no longer required to collect vendor shelf prices every six months, as EBT redemption data are a sufficient replacement. Each State agency's policies must reflect their use of EBT redemption data to monitor vendor compliance with cost containment requirements.
- **Vendor Agreements:** Beginning on February 4, 2027, all new or renewed vendor agreements must specify that the vendor will:
    - Treat WIC customers the same as non-WIC customers in the event of a supplemental food recall.
    - Make participants aware of the total purchase price before the transaction is completed.
    - Authenticate transactions in accordance with State agency policy.
    - Not charge the State agency for fees associated with WIC purchases and allow participants to pay such fees with another tender type.

  State agencies may use vendor agreement addenda to meet these requirements. State agencies should work with their legal counsel to make any updates to their vendor agreements. Vendor agreements must continue to cover all other provisions of 7 CFR 246.12(h)(3).
- **Farmer and Farmers' Market Agreements:** Beginning on February 4, 2027, all new or renewed farmer and farmers' market agreements must specify that the farmer or farmers' market will:
    - Authenticate transactions in accordance with State agency procedures.
    - Make participants aware of the total purchase price before the transaction is completed.

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- Not charge the State agency for fees associated with WIC purchases and allow participants to pay such fees with another tender type.

State agencies may use agreement addenda to meet these requirements. State agencies should work with their legal counsel to make any updates to their agreements. Farmer and farmers' market agreements must continue to cover all other provisions of 7 CFR 246.12(v)(1).

Additionally, the final rule updates reporting requirements for the Food Delivery Portal (FDP) to better reflect what State agencies are already reporting annually (7 CFR 246.12(j)(5)). State agencies should continue to follow annual reporting guidelines.

IV. REQUIREMENTS FOR STATE AGENCIES USING NEW OPTIONS

This section summarizes provisions that must be implemented by State agencies that are using new options to support modernization including online shopping (i.e., authorizing internet vendors), virtual oversight methods, or mobile pay at the time of publication to be in compliance with updated regulations. The section also addresses a new option for State agencies with a home food delivery system. Unless otherwise noted, the deadline to implement these provisions is February 4, 2027, 90 days from the date of publication, although State agencies may implement provisions beginning on December 7, 2026, when the rule becomes effective.

Any State agency that is not currently using the new modernization options (e.g., online shopping and mobile pay) may pursue the options summarized in this section on their own timeline and based on their capacity. However, State agencies must submit and receive approval of any updated policies, procedures, and State Plan amendments that capture resulting changes to food delivery operations before implementation.

- **New Vendor Types:** In addition to brick-and-mortar vendors (most currently authorized WIC vendors), State agencies may authorize internet vendors and mobile vendors. State agencies opting to authorize internet or mobile vendors must ensure that all authorized vendors meet Federal and State agency selection criteria. State agencies authorizing internet vendors must include their approach

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for authorization (i.e., assigning vendor IDs) and for ensuring program integrity in their policies and procedures.

- **Virtual Oversight:** State agencies may use virtual methods for preauthorization visits, routine monitoring visits, and compliance buys. Compliance buy documentation only needs to include a description of the cashier if applicable. State agencies authorizing internet vendors and State agencies opting to use virtual oversight methods must ensure their policies and procedures reflect these virtual operations.
- **Return of Benefits** (implementation deadline: November 6, 2028, 24 months from the date of publication): State agencies that authorize internet vendors must allow for the return of electronic benefits to a participant's balance for all vendor types; this is an option for State agencies that do not authorize internet vendors. State agencies must be able to account for the disposition of all food instruments (7 CFR 246.12(q)) and must ensure their State Plan describes this process.
    - **Seven Days Beyond Last Date of Use:** State agencies that allow for the return of electronic benefits may allow participants to transact benefits up to seven (7) days beyond the last date of use.
- **Food Instruments:** State agencies may use food instruments other than the EBT card to provide electronic benefits (e.g., mobile pay). State agencies may permanently use multiple food instrument types, so long as each food instrument type is uniform. Any food instrument type the State agency decides to use must be described and approved by FNA in the State Plan.
- **Home Food Delivery:** State agencies may allow participants to designate a location for delivery in a home food delivery system. Participant-designated locations must be approved by the State agency. The State agency must describe their home food delivery system operations in their State Plan.

FNA is committed to working with State agencies on timely implementation. If a State agency determines that extenuating circumstances preclude compliance with the implementation date for a required provision, they should contact their State FNA staff contact.

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State agencies may direct any questions to their FNA State contact.

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APPENDIX A: WIC Online Shopping Final Rule Provisions

Table A.1. Required Changes for All State Agencies.

The below provisions must be implemented by February 4, 2027.

Implementation Checklist Section	Provisions	Regulatory Citations (7 CFR 246)	Resulting Changes
A	Transaction Authentication Policy	§§ 246.12(h)(3)(vi), 246.12(h)(3)(xxxii), 246.12(bb)(2)	The final rule removes the requirement that paper food instruments must be signed, or that a PIN must be entered, in the presence of a cashier. The rule requires State agencies to develop transaction authentication policies, such as use of a PIN. State agencies must receive written approval from FNA to adopt an authentication method other than the PIN, but no FNA approval is necessary for State agencies to continue using PIN as their method of transaction authentication.
B	Remote Benefit Issuance	§§ 246.4(a)(23), 246.7(f)(2)(iv), 246.12(r)(2), 246.12(r)(4), and 246.12(r)(5)	The final rule permanently allows State agencies to mail EBT cards and remotely issue electronic benefits under any circumstances. State agencies must have policies in place to ensure receipt of the mailed EBT card by the intended recipient and must address remote issuance in their plan to improve access to the program, a component of the State Plan.
C	EBT Redemption Data Policies	§§ 246.12(g)(4), 246.12(g)(4)(ii)(B), and 246.12(g)(9)	The final rule allows State agencies to use EBT redemption data to monitor vendor compliance with cost containment requirements. State agencies with EBT redemption data will no longer need to collect shelf prices every six months or request an exemption to use EBT redemption data. State agencies are still responsible for analyzing vendor applicant prices at authorization and reauthorization and may use the vendor applicant's EBT data when available.

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Implementation Checklist Section	Provisions	Regulatory Citations (7 CFR 246)	Resulting Changes
D	Vendor Agreements: Recalls	§§ 246.12(h)(3)(ii), 246.12(h)(3)(ii)(A), and 246.12(h)(3)(ii)(C)	The final rule requires that vendors treat WIC customers the same as non-WIC customers in the event of a supplemental food recall. There are no other circumstances in which a vendor may provide any substitution, cash, credit, cash refunds, or exchanges other than the authorized supplemental foods available in the participant's benefit balance. The final rule clarifies that "cash refunds" includes, but is not limited to, gift cards or store credit, and expands on what qualifies as an "identical authorized supplemental food item."
D	Vendor Agreements: Purchase Price	§ 246.12(h)(3)(v)	The final rule requires that participants are made aware of the total purchase price before the transaction is completed.
D	Vendor Agreements: Transaction Security	§§ 246.12(h)(3)(xxxii) and 246.12(h)(3)(vi)	The final rule specifies that vendors must authenticate transactions in accordance with State agency policy. While this replaces the federal requirement that vendors ensure the participant enters a PIN in the presence of a cashier, State agencies may continue to do so at their discretion.
D	Vendor Agreements: Fees associated with WIC Purchases	§ 246.12(h)(3)(xxxiii)	The final rule prohibits vendors from charging State agencies for fees associated with WIC purchases (e.g., delivery, service, convenience, bag fees) and requires that WIC participants be allowed to pay such fees using another tender type if they are assessed to non-WIC customers using the same services.
E	Farmer and Farmers' Market Agreements: Transaction Security	§ 246.12(v)(1)(iv)	The final rule specifies that farmers and farmers' markets must transact cash-value benefits (CVB) in accordance with procedures established by the State agency, including transaction authentication policy.

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Implementation Checklist Section	Provisions	Regulatory Citations (7 CFR 246)	Resulting Changes
E	Farmer and Farmers' Market Agreements: Purchase Price	§ 246.12(v)(1)(iv)(B)	The final rule requires that participants are made aware of the total purchase price before the CVB transaction is completed.
E	Farmer and Farmers' Market Agreements: Fees associated with WIC Purchases	§ 246.12(v)(1)(ix)	The final rule prohibits farmers and farmers' markets from charging the State agency for fees associated with WIC purchases (e.g., delivery, service, convenience, bag fees) and requires that WIC participants be allowed to pay such fees using another tender type if they are assessed to non-WIC customers using the same services.
N/A	Food Delivery Portal Reporting	§ 246.12(j)(5)	The final rule updates reporting requirements for the Food Delivery Portal (FDP) to better reflect what State agencies are already reporting annually.

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Table A.2. Provisions Required for Select State Agencies Using Flexibilities (e.g., Online Shopping and Mobile Pay).

Unless otherwise stated, the below provisions must be implemented by February 4, 2027.

Implementation Checklist Section	Provisions	Regulatory Citations (7 CFR 246)	Resulting Changes
H	Return of electronic benefits	§§ 246.12(x)(4) and 246.12(x)(4)(i)-(ii)	If a State agency authorizes internet vendors, they must allow for the return of electronic benefits to a participant's balance for all vendor types. Participants must be allowed to transact returned benefits for the remainder of the benefit issuance month. The implementation deadline for this provision is November 6, 2028, 24 months after publication. State agencies that do not authorize internet vendors may choose to adopt this policy flexibility at their discretion but are not required to do so; implementation is **not** required within the 24-month timeframe. If opting to allow for the return of electronic benefits: in-person returns must be processed immediately, and post-delivery returns (e.g., online orders that were returned by mail, incorrectly fulfilled, or not fulfilled at all) must be processed within two business days after receipt of the returned item or indication of an incorrectly fulfilled item.
H	Seven days beyond last date of use	§ 246.12(x)(4)(iii)	State agencies have the option to allow participants to transact returned electronic benefits for up to seven calendar days beyond the last date of use. State agencies may choose to provide this option at any time; implementation is **not** required within a specific timeframe.
F	New vendor types	§ 246.2	In addition to brick-and-mortar vendors, the final rule allows State agencies to authorize internet and mobile vendors.

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Implementation Checklist Section	Provisions	Regulatory Citations (7 CFR 246)	Resulting Changes
G	Virtual oversight	§ 246.12(g)(5), 246.2, 246.12(j)(6)(ii)(B)	The final rule allows State agencies to use virtual methods of preauthorization visits, routine monitoring, and compliance buys. These methods may be used for oversight of any vendor type. State agencies should use methods appropriate for their vendor population. The final rule adjusts compliance buy documentation to only include a description of the cashier involved if applicable.
I	Food instruments	§§ 246.2 and 246.12(b)	The final rule allows State agencies to use new types of food instruments (e.g., mobile payments). State agencies may permanently use multiple food instrument types at once, so long as the technology and functionality are uniform within each food instrument type.
J	Home food delivery	§ 246.2	The final rule allows home food delivery contractors to deliver supplemental food to a location designated by participants and approved by the State agency. State agencies may choose to provide this option at any time; implementation is **not** required within a specific timeframe.

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Table A.3. Provisions that do not Require State Agency Action.

Provisions	**Regulatory Citations (7 CFR 246)**	**Resulting Changes**
Modernizing benefits language	§§ 246.2, 246.12(b) and 246.12(v)(1)(iv)(A)	The final rule revises regulations to clarify which provisions only apply to paper food instruments versus electronic benefits and EBT cards. These revisions include: • Separately defining “cash-value benefit” (CVB) from “cash-value voucher” (CVV). • Defining “electronic benefits.” • Clarifying that EBT is not a food delivery system, but a benefit delivery method. • Incorporating CVB into regulatory language for farmer and farmers’ market agreements.
Conforming revisions	§§ 246.2, 246.12(x)(2)(iii), 246.14(b)(1)(i), and 246.14(c)(4)	The final rule makes conforming edits to reflect the substantive changes reviewed in tables A.1 and A.2. These revisions include: • Adjusting the definition of “above-50-percent vendors” to reference any type of vendor. • Incorporating a reference to the last date of use exception for returned electronic benefits. • Clarifying that in a home food delivery system or direct distribution food delivery system, State agencies can continue using food funds to pay for the cost of transporting food under these two food delivery systems, as opposed to the retail food delivery system in which State agencies cannot use food funds to pay for the cost of transporting food.
Correction	§ 246.12(h)(3)(ii)(B)	Corrected a regulatory citation to reference the correct paragraph.

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APPENDIX B: Sample Language for Transaction Authentication Policies

As required per the final rule, State agencies must develop a transaction authentication policy (7 CFR 246.12(bb)(2)). State agencies may use the following language in drafting their policies, although State agencies are ultimately encouraged to review policy language with their legal counsel. The provided draft language is organized so that State agencies can choose which paragraphs apply to them, based on their vendor authorization choices (e.g., opting to authorize internet vendors) and transaction security choices (e.g., opting to use Open Authorization or OAuth). Until there is a transaction authentication method that meets or exceeds the security offered by the PIN, the assumed authentication method for transactions at brick-and-mortar and mobile vendors will continue to be the PIN method.

I. State agencies that maintain use of the PIN and do not authorize internet vendors (i.e., maintaining status quo):

[State agency] requires that all WIC transactions for brick-and-mortar [and mobile] vendors be authenticated using a Personal Identification Number (PIN). PIN technology must be implemented per the WIC EBT Operating Rules, standards, and technical requirements as established by USDA, per 7 CFR 246.12(bb)(1).

II. State agencies that authorize internet vendors.

Vendors must authenticate WIC transactions using only the allowable transaction authentication methods described below. [State agency] will notify vendors of any updates to the respective standards and technical requirements in a timely manner.

a. For brick-and-mortar and mobile vendors:

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[State agency] requires that all WIC transactions for brick-and-mortar [and mobile] vendors be authenticated using a Personal Identification Number (PIN). PIN technology must be implemented per the WIC EBT Operating Rules, standards, and technical requirements as established by USDA, per 7 CFR 246.12(bb)(1).

b. For internet vendors with PIN:

[State agency] requires that all WIC transactions for internet vendors be authenticated using a Personal Identification Number (PIN). PIN technology must be implemented per the WIC EBT Operating Rules, standards, and technical requirements established by USDA, per 7 CFR 246.12(bb)(1). Specifically, vendors must use the PIN authentication messaging standards described in [reference appropriate standard].

c. For internet vendors with OAuth:

[State agency] requires that all WIC transactions for internet vendors be authenticated using Open Authorization (OAuth). OAuth technology must be implemented per the WIC EBT Operating Rules, standards, and technical requirements established by USDA, per 7 CFR 246.12(bb)(1). Specifically, vendors must use the OAuth messaging standards described in [reference appropriate standard].

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