

Patricia Bailey
Chief, WIC Vendor and Technology Branch
Policy Division, Supplemental Nutrition and Safety Programs
Food and Nutrition Service, USDA
1320 Braddock Place
Alexandria, Virginia 22314

May 24, 2023

Dear Ms. Bailey,

The undersigned organizations are committed to supporting the health and well-being of military families by working to end military hunger and ensuring access to support programs and resources. We support the USDA Food and Nutrition Service's mission to increase food security and reduce hunger by providing children and low-income people access to food, a healthy diet, and nutrition education through participation in the WIC program.

In 2022, a Department of Defense study reported that 24% of active duty service members are experiencing food insecurity.¹ When asked where military families turn when they need food support, again and again, they tell us they rely on friends and family or community food pantries.² Barriers to access, such as difficulty accessing WIC clinics to receive benefits and the shame and stigma associated with using support programs in the military community, have led to an underutilization of WIC.

We share the following for consideration regarding online ordering and transactions and food delivery revisions to better meet the needs of a modern, data-driven program and to help facilitate participation in the WIC program by qualifying military families:

- **Remove Barriers to Online Ordering and Internet-Based Transactions:** Like their civilian counterparts, military families value the convenience of ordering online and having pick-up and delivery grocery options. As more and more vendors—including the Commissary—move towards providing online shopping options, it is important to ensure the dignity and equity of WIC participants by allowing them to utilize these services.
- **Streamline and Modernize WIC Food Delivery:** One of the challenges military families face when utilizing their WIC benefits is the requirement that they travel to the WIC office monthly to renew their benefits. We can alleviate transportation and childcare issues that create access barriers by allowing participants to renew their benefits online. Additionally, allowing state agencies to develop the capability to adopt new technologies beyond the EBT card further supports efforts to uphold the dignity of WIC clients and ensures equitable access.
- **Meet the Needs of a Modern, Data-Driven Program:** To ensure the successful implementation of these program enhancements, WIC offices will need additional staff to support the technical and customer support requirements of all WIC participants. We strongly encourage the

¹ Office of the Under Secretary for Personnel & Readiness, U.S. Department of Defense. *Strengthening Food Security in the Force: Strategy and Roadmap*. July 2022. <https://media.defense.gov/2022/Jul/14/2003035423/-1/-1/1/STRENGTHENING-FOOD-SECURITY-IN-THE-FORCE-STRATEGY-AND-ROADMAP.PDF>

² Military Family Advisory Network. *2021 Military Family Support Programming Survey*. July 2022. <https://www.mfan.org/research-reports/2021-military-family-support-programming-survey-results-2/>

consideration of military spouses to fulfill these roles, as they bring unique lived experiences and insight to the successful implementation of these rules.

Successful implementation of these proposed rule changes will modernize the WIC program and ensure equitable access to healthy, nutritious foods. We appreciate the opportunity to provide comments and highlight how these rule changes will support the military community.

Respectfully,

Air Force Sergeants Association
American Logistics Association
Armed Services YMCA
Blue Star Families
Elizabeth Dole Foundation
Hope For The Warriors
Lauren Hope Collective
MAZON: A Jewish Response to Hunger
Military Family Advisory Network
Military Resale Small Business Coalition
Military Spouse Advocacy Network
Modern Military Association of America
National Military Family Association
Stronghold Food Pantry
UNC Lineberger Comprehensive Cancer Center