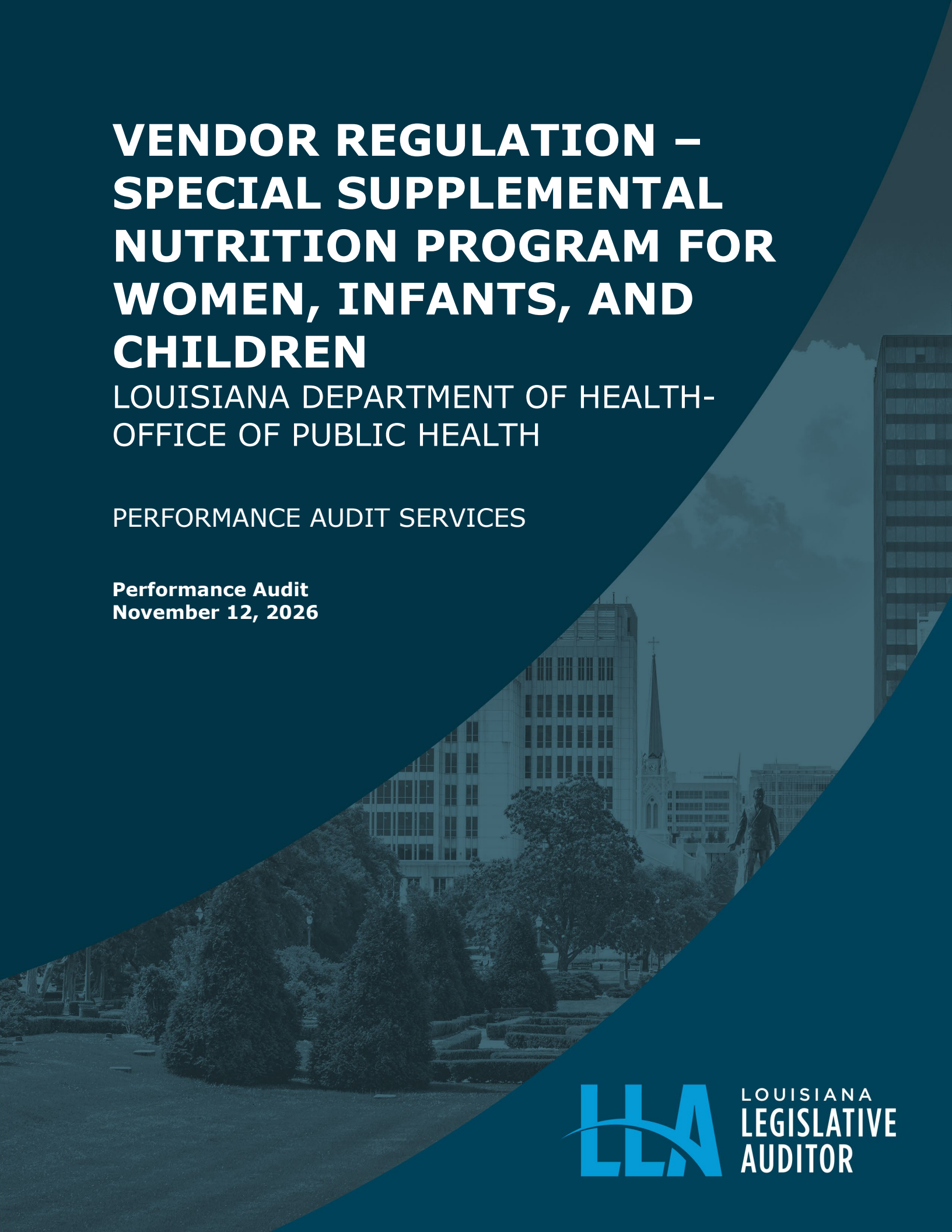
VENDOR REGULATION – SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN, INFANTS, AND CHILDREN

LOUISIANA DEPARTMENT OF HEALTH-
OFFICE OF PUBLIC HEALTH

PERFORMANCE AUDIT SERVICES

Performance Audit
November 12, 2026



LOUISIANA LEGISLATIVE AUDITOR

LOUISIANA LEGISLATIVE AUDITOR
1600 NORTH THIRD STREET
POST OFFICE BOX 94397
BATON ROUGE, LOUISIANA 70804-9397

LEGISLATIVE AUDITOR
MICHAEL J. "MIKE" WAGUESPACK, CPA

FIRST ASSISTANT LEGISLATIVE AUDITOR
BETH Q. DAVIS, CPA

DIRECTOR OF PERFORMANCE AUDIT SERVICES
EMILY DIXON, CIA, CGAP, CRMA, MBA

PERFORMANCE AUDIT MANAGER
GINA V. BROWN, CIA, CGAP, CRMA, MPA

AUDIT TEAM
WILLIAM TAYLOR POTTER, MA
ASHLEY BRECHEEN, MA

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LOUISIANA LEGISLATIVE AUDITOR

MICHAEL J. "MIKE" WAGUESPACK, CPA
LOUISIANA LEGISLATIVE AUDITOR

November 12, 2026

The Honorable J. Cameron Henry, Jr.,
President of the Senate
The Honorable Phillip R. Devillier,
Speaker of the House of Representatives

Dear Senator Henry and Representative Devillier:

This report provides the results of our evaluation of the Louisiana Department of Health's (LDH) regulation of vendors in the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) to promote successful redemption of food benefits by participants.

Overall, we found LDH could improve its regulation of vendors by updating vendor authorization materials and criteria, ensuring all vendors receive periodic, formal monitoring, and better addressing purchasing issues with WIC-approved foods.

Specifically, we found that following the U.S. Department of Agriculture's (USDA) 2014-2017 moratorium on Louisiana's ability to add new WIC vendors, the state lost 57.1% of its authorized vendors. Since the moratorium was lifted in 2017, LDH had only increased the number of WIC vendors by 24.5% in state fiscal year 2026. Fewer than half of Louisiana neighborhoods and only 18% of low-income neighborhoods are considered to have convenient access to an authorized WIC vendor.

We also found that LDH's vendor application and checklist direct applicants to the vendor requirements, but the materials do not clearly explain exceptions to the state's criteria in underserved areas. As a result, non-traditional vendors in those areas may not apply for authorization because they do not meet all requirements, even if they could qualify for an exception.

In addition, while the USDA does not require state agencies to monitor all vendors at least once during a defined period of time, we found that LDH did not conduct a routine monitoring visit or compliance investigation of 223 (63.9%) of 349 vendors from federal fiscal years 2023 through 2026.

We also found that LDH could improve the WIC shopping experience and participation by better addressing trends in vendor complaint data. For example,

72.6% of vendor complaints indicated transaction issues such as a participant not being able to complete a WIC purchase at the register.

The report contains our findings and recommendations. I hope this report will benefit you in your legislative decision-making process.

We would like to express our appreciation to LDH for its assistance during this audit.

Respectfully submitted,



Michael J. "Mike" Waguespack, CPA
Legislative Auditor

MJW/aa

WICVENDOR

Louisiana Legislative Auditor

Michael J. "Mike" Waguespack, CPA

Vendor Regulation – Special Supplemental Nutrition Program for Women, Infants, and Children
Louisiana Department of Health – Office of Public Health

November 2026 *Audit Control # 40250038*

Introduction

We evaluated the Louisiana Department of Health's (LDH) regulation of vendors for Louisiana's Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). During our audit and until October 1, 2026, the WIC program was administered by LDH's Bureau of Nutrition Services within the Office of Public Health (OPH).[1] The WIC program is a federally-funded program that provides healthy foods, nutrition education, breastfeeding support, and referrals to other health and social services programs to low-income pregnant, postpartum, and breastfeeding women, as well as to infants and children under the age of five. LDH creates and implements rules and procedures for Louisiana's program,[2] which are then approved by the United States Department of Agriculture (USDA), the federal agency that oversees WIC.

As of September 2026, Louisiana had **391** authorized WIC vendors serving the state's 109,034 WIC participants (69,057 families), according to LDH.

Example of WIC Vendor in Louisiana



Source: Picture taken by legislative auditor's staff

We conducted this audit because proper vendor regulation is needed to ensure sufficient access to vendors and successful redemption of food benefits which offer essential nutrition to at-risk mothers, infants, and children. The availability of vendors for participants to easily redeem WIC benefits is important because of the health benefits of the program, and because LDH only draws down funds it uses, leaving unspent funding with the USDA rather than being used in Louisiana's economy. As mentioned in our June 2026 audit, *Oversight of Outreach and Participation-Special Supplemental Nutrition*

[1] Act 368 of the 2026 Regular Legislative Session restructured LDH and moved WIC under the newly-created Office of Health and Nutrition effective October 1, 2026. Parish public health units, many of which operate WIC clinics, will remain under OPH.

[2] According to LDH, these rules and procedures comply with the Code of Federal Regulations and Louisiana Administrative Code.

Program for Women, Infants, and Children, during federal fiscal years 2021 through 2024, the state did not use $111.6 million (34.6%) of available WIC funding.[3]

WIC vendors are a vital part of the federal WIC program. The vendors, which are typically grocery stores, are where WIC participants redeem their benefits for the food and formula loaded onto their EBT cards. To become authorized WIC vendors, stores must meet federal and state criteria and complete an application with LDH. The USDA tasks LDH with the routine monitoring of authorized vendors to ensure compliance with state and federal criteria, as well as investigating vendors identified by LDH as high risk for potential fraud or noncompliance. As of September 2026, Louisiana had 391 authorized WIC vendors serving 109,034 participants (69,057 families), according to LDH.

Example of WIC Item in Store



Source: Picture taken by legislative auditor's staff

We evaluated barriers in vendor participation and participant access to WIC vendors. We also analyzed LDH's vendor monitoring data, including formal monitoring and participant complaints related to vendors and WIC shopping issues. As mentioned previously, Louisiana has left millions in federal funding unused, as the state had the lowest participation rates in the nation, and those who do participate in the program do not redeem all available food benefits. While the June 2026 audit focused on participant enrollment and WIC clinic services, this report examines ways to improve program participation through increasing vendor access and improving the WIC shopping experience.

The objective of this audit was:

To evaluate LDH's regulation of WIC vendors to promote successful redemption of food benefits by participants.

Our results are summarized on the next page and discussed in detail throughout the remainder of the report. Appendix A contains LDH's response, and Appendix B contains our scope and methodology. Appendix C summarizes criteria for authorized vendors and eligibility for LDH's Participant Access Determinations.

[3] We also issued an informational brief on WIC services, participation, and vendors in December 2025.

Objective: To evaluate LDH's regulation of WIC vendors to promote successful redemption of food benefits by participants.

Overall, we found LDH could make improvements in its regulation of vendors by updating vendor authorization materials and criteria, ensuring all vendors receive periodic, formal monitoring, and better addressing issues with purchasing WIC-approved foods. These improvements may increase vendor access, which could improve program participation and food benefit redemption rates. Specifically, we found the following:

- **Following the USDA moratorium from 2014 through 2017 on Louisiana's ability to add new WIC vendors, the state lost 57.1% of its authorized vendors. Since the moratorium was lifted in 2017, LDH had only increased the number of WIC vendors by 24.5% in state fiscal year 2026. Fewer than half of Louisiana neighborhoods and only 18% of low-income neighborhoods are considered to have convenient access to an authorized WIC vendor.** We found that, on average, households with mothers who gave birth in a given month were 6.0 percentage points less likely to use their WIC benefits that month than other households. Specifically, 81.4% of households without a birth used their WIC benefits that month as compared to 75.4% of households that did experience a birth.

- **LDH's vendor application and checklist direct applicants to the vendor requirements, but the materials do not clearly explain exceptions to the state's criteria in underserved areas. As a result, nontraditional vendors in those areas may not apply for authorization because they do not meet all requirements, even if they could qualify for an exception.** In addition, prospective WIC vendors may face delays in initial authorization by as many as four months because of LDH's authorization schedules, which could impact vendor participation.

- **While the USDA does not require state agencies to monitor all vendors at least once during a defined period of time, we found that LDH did not conduct a routine monitoring visit or compliance investigation of 223 (63.9%) of 349 vendors during federal fiscal years 2023 through 2026.** Routine monitoring is important to ensure vendors are providing proper services to WIC participants.

- **LDH could improve WIC shopping experience and participation by better addressing trends in vendor complaint data, as**

72.6% of vendor complaints indicated transaction issues such as a participant not being able to complete a WIC purchase at the register. Addressing these concerns may also increase redemption rates. In addition, the availability of certain products, such as specialty formulas, appears to cause confusion for some participants.

Our findings and our recommendations are discussed in more detail in the following sections.

Following the USDA moratorium from 2014 through 2017 on Louisiana's ability to add new WIC vendors, the state lost 57.1% of its authorized vendors. Since the moratorium was lifted in 2017, LDH had only increased the number of WIC vendors by 24.5% in state fiscal year 2026. Fewer than half of Louisiana neighborhoods and only 18% of low-income neighborhoods are considered to have convenient access to an authorized WIC vendor.

In 2014, the USDA implemented a moratorium on LDH's ability to authorize new WIC vendors because of issues with the state's vendor monitoring processes. These issues, which were noted in a November 2013 LLA report,[4] included LDH not verifying the accuracy of prices charged by WIC vendors, not reporting disqualified WIC vendors to the USDA as required by federal law, not identifying and monitoring high-risk vendors, and not sanctioning vendors for violations. The USDA lifted the moratorium in May 2017 after LDH made changes to its processes, including improving authorization criteria, establishing vendor peer groups, and filling key vacancies. While LDH and stakeholders stated the tighter regulation and processes were not well-received by vendors who felt WIC had become more punitive, several stakeholders[5] we interviewed report increased satisfaction with LDH's current administration and praised the program's progress.

Following the USDA moratorium from 2014 through 2017 on Louisiana's ability to add new WIC vendors, the state lost 57.1% of its authorized vendors. Since the moratorium was lifted in 2017, LDH had only increased the number of WIC vendors by 24.5% in state fiscal year 2026. [6] According to LDH, stronger rules and processes reduced a vendor's ability to

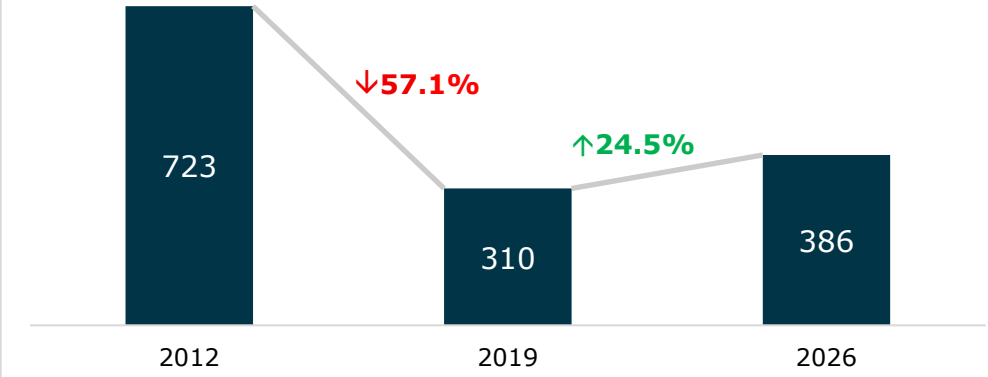
[4] Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), Office of Public Health, Department of Health and Hospitals, November 2013

[5] Stakeholders include members of LDH's WIC Vendor Advisory Committee and other vendor representatives.

[6] These vendor counts are based on the maximum number of vendors over the course of state fiscal year 2026.

commit fraud and resulted in the withdrawal or removal of bad actors. A 2025 USDA study found Louisiana experienced a higher decline in vendors than other states during calendar years 2015 through 2022, with a rate of decline of 24.5% compared to the national average of 15.9%. The study also found that Louisiana had 57.1% fewer vendors during state fiscal year 2019[7] than it did prior to the 2014 moratorium. During federal fiscal year 2012, Louisiana had 723 authorized vendors where WIC participants could use their EBT cards to purchase allowed food. Exhibit 1 shows the change in the number of WIC vendors in Louisiana from state fiscal years 2012 to 2026.[8]

Exhibit 1
Change in Number of WIC Vendors
State Fiscal Years 2012 through 2026



Source: Prepared by legislative auditor's staff using information provided by LDH.

In addition, other factors that contributed to the decrease in vendors include new technological requirements to support the USDA's transition from paper-vouchers to EBT and general market volatility, including competition from online markets like Amazon and major acquisitions. For example, ALDI Grocery Stores purchased the parent company of Winn-Dixie in 2023 with plans to rebrand some of the Winn-Dixie stores as ALDI stores, resulting in 20 fewer WIC vendors in the state. Many Winn-Dixie stores in Louisiana were authorized WIC vendors, but ALDI is not eligible to participate in WIC because it does not carry specific brands of formula required by the USDA. In October 2025, Winn-Dixie announced the remaining Louisiana stores would close as the company withdrew from the Louisiana market.

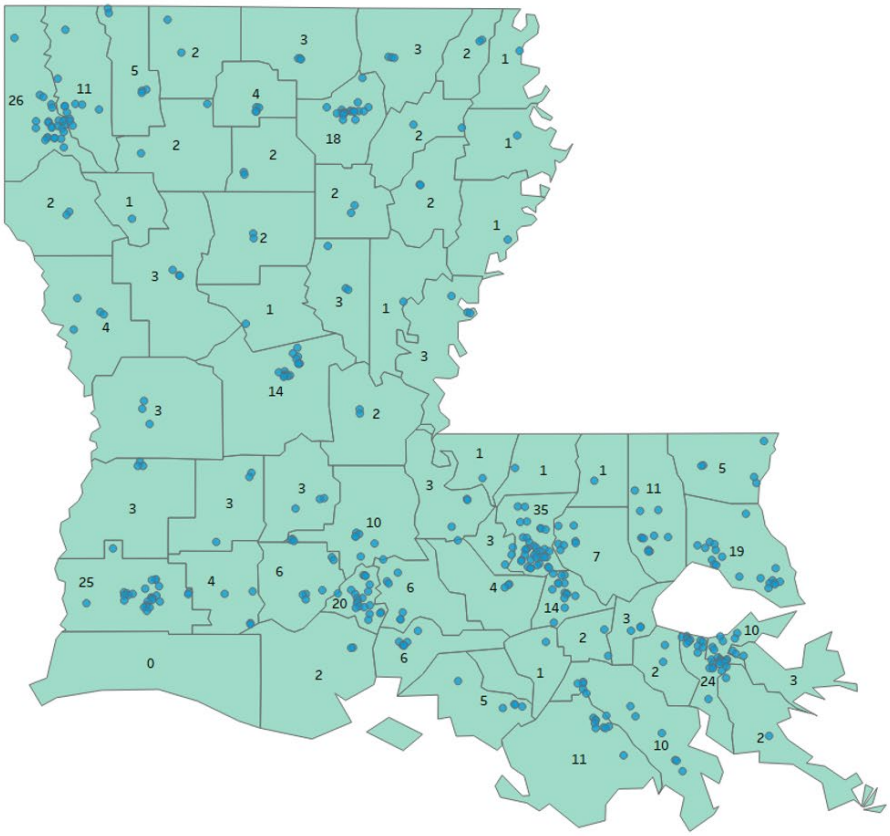
[7] We used state fiscal year 2019 for comparison because LDH upgraded its data system in October 2018, making fiscal year 2019 the earliest year we could obtain a vendor count from LDH. The 2012 vendor count was obtained from our previous WIC audit.
[8] According to LDH, as of October 2026, the number of authorized WIC vendors in Louisiana increased to 395.

Only 43% of low-income areas[9] are considered to have convenient access to an authorized WIC vendor, according to a 2025 USDA study on participant access,[10] which is the second-lowest rate of all states and Washington D.C. In Louisiana, the rate is lower for low-income areas, with only 18% having convenient access to a WIC vendor. We found that during calendar year 2025, WIC participants used their EBT cards approximately 221,000 times at vendors that were at least 20 miles from the WIC clinic where their benefits were loaded onto their card, making up roughly 9.1% of the approximately 2.4 million WIC transactions during 2025. This suggests either the clinic or the vendor may be a substantial distance from the participant's residence. According to the Food Research and Action Center,[11] a lack of reliable transportation and distance to clinics and vendors tend to be significant barriers for WIC participants, adding potential costs and additional time away from work. Exhibit 2 shows the location of the 391 WIC vendors in Louisiana, along with the number of vendors in each parish, as of September 2026.

> LDH Secretary Bruce Greenstein stated at the August 17, 2026, Louisiana Senate Select Committee on Women and Children, "We also are more interested to get a new crop of providers, which are our grocers, that are eligible to be WIC providers, into the program as well. We want to try to address food deserts through the WIC program."

[9] As determined using census tracts, which are small, neighborhood-like geographic areas containing between 1,200 and 8,000 people. As of the 2020 census, Louisiana has 1,388 census tracts.
[10] WIC Participant Access to Authorized Vendors Study - Part 1, USDA, December 2025
[11] Making WIC Work Better: Strategies to Reach More Women and Children and Strengthen Benefits Use, FRAC, May 2019

Exhibit 2
Number and Location of Louisiana WIC Vendors
As of September 2026



Source: Prepared by legislative auditor's staff using information from LDH.

We found that, on average, households with mothers who gave birth in a given month were 6.0 percentage points less likely to use their WIC benefits that month than other households. Specifically, 81.4% of households without a birth used their WIC benefits that month as compared to 75.4% of households that did experience a birth.[12] This is likely due to the fact that during the first month postpartum, the mother is still recovering and may have limited ability to travel and/or drive. This may also indicate that Louisiana should consider adopting policies on grocery delivery if the USDA decides to allow the practice. At least two states – Washington and Massachusetts – have partnered with Walmart for an online ordering pilot offering delivery or pickup options. In April 2025, USDA's Food and Nutrition Administration (FNA) posted that it proposed removing barriers to online ordering and internet-based transactions in WIC. This proposed rule would eliminate the barriers to online shopping and grocery delivery or pickup for WIC participants. According to the FNA,

[12] These factors include distance to the nearest vendor and number of beneficiaries in the household. Please see Appendix B for additional information on our logistical regression model, showing the high statistical significance of the impact of having a birth in a given month on benefit usage.

this proposed rule is expected to improve the WIC shopping experience while increasing equity and access to nutritious foods for WIC participants, thus positively impacting nutrition security. However, as of October 2026, the USDA is still piloting online WIC shopping programs in select states. According to LDH, it is able to consider offering online ordering/grocery delivery when allowed nationwide by the USDA because it now meets the technology requirement of online EBT issuance as of August 2026.

Recommendation 1: LDH should work with potential vendors to increase vendor access in low-income areas while still complying with USDA criteria.

Summary of Management's Response: LDH agreed with this recommendation and stated that it will develop and implement a statewide WIC vendor recruitment strategy by January 2027 designed to expand retailer participation, strengthen vendor retention, and improve access to WIC-authorized retailers across Louisiana. See Appendix A for LDH's full response.

Recommendation 2: LDH should work with the USDA to increase vendor access for households immediately after a child is born. This could include adopting policies on online ordering/grocery delivery if and when allowed by the USDA.

Summary of Management's Response: LDH agreed with this recommendation and stated that it is advancing efforts to modernize the WIC shopping experience by preparing for online shopping as a strategic pathway to expand participant access, enhance vendor participation, and increase flexibility in how WIC benefits are redeemed. To support this initiative, LDH plans to apply for grant funding through the Center for Nutrition and Health Impact under its new WIC Online Shopping Implementation Initiative. See Appendix A for LDH's full response.

LDH's vendor application and checklist direct applicants to the vendor requirements, but the materials do not clearly explain exceptions to the state's criteria in underserved areas. As a result, nontraditional vendors in those areas may not apply for authorization because they do not meet all requirements, even if they could qualify for an exception.

To participate in WIC, prospective vendors must meet USDA and state criteria, though there are exceptions. Federal criteria include providing a minimum

variety and quantity of WIC-eligible food, having business integrity,[13] being eligible to be a Supplemental Nutrition Assistance Program (SNAP) vendor, offering competitive pricing, restricting incentive items for A50 stores,[14] and EBT capability. In addition to the USDA's requirements, state agencies can impose their own, more restrictive criteria for WIC vendors. LDH implements additional criteria, including requiring full-line grocery store status, certain hours of operation, and SNAP authorization, among others.

Even though the USDA allows states to authorize WIC vendors that do not meet all required criteria, LDH does not clearly communicate all exceptions on its WIC application or vendor checklist. Ensuring nontraditional vendors are aware of these exceptions could increase the number of vendor applications in underrepresented areas. In cases where a prospective vendor applies for WIC authorization and does not meet all criteria, the USDA allows LDH to grant exemptions by performing a Participant Access Determination. This determination assesses whether authorizing the vendor would help with sufficient access to WIC-eligible foods in the area, as defined by the individual state agencies. LDH defines sufficient access as having an authorized WIC vendor within three miles.[15] If LDH determines the vendor is needed to ensure sufficient access, the agency can authorize the vendor even if it does not meet state and certain federal criteria.

LDH's WIC vendor application and checklist for prospective vendors do not mention the Participant Access Determination process nor clearly state the allowed exceptions, which may deter potential vendors that could serve an underrepresented area from applying for authorization. According to LDH, there have been discussions about the merits of promoting exceptions to the criteria and the Participant Access Determination process. However, the agency has concerns about the quality of services vendors can provide if they do not meet the criteria. Exhibit 3 summarizes the WIC Vendor criteria that the USDA allows LDH to waive based on Participant Access Determinations. Appendix C summarizes all WIC Vendor criteria and whether an exception can be made for each requirement.

[13] The USDA requires state agencies to consider the business integrity of a vendor applicant, which includes criminal activity and civil judgements.
[14] A50 stores are vendors that get at least 50% of their revenue from WIC transactions. The USDA prohibits A50 stores from providing incentives to WIC participants, such as free merchandise.
[15] As of August 2026, LDH began taking geographical barriers into consideration when determining sufficient vendor access, such as a river.

Exhibit 3 WIC Vendor Requirements for Which USDA Allows Exceptions
✓ Authorized and participating as a SNAP vendor
✓ Be open a minimum of 6 days and at least 48 hours per week
✓ Display prices for WIC-approved food items on the foods or on the shelves or display area
✓ Have prices that are competitive with other vendors in the vendor's designated peer group
✓ Maintain establishment in a clean, orderly, and safe condition
✓ Must be a full-line grocery store*
✓ Must be in good standing with no unpaid or overdue balances owed to LDH
✓ Must not derive or expect to derive more than 50% of annual food sales revenue from WIC transactions
✓ Must utilize a cash register system that performs split tender transactions and produces itemized receipts
✓ The vendor or any of its current owners, officers, or managers cannot have had a civil judgement entered against them in the last six years for any activity indicating a lack of business integrity
✓ The vendor or any of its current owners, officers, or managers cannot have been convicted of any federal, state, or local tax violations in the past six years
✓ The vendor or any of its current owners, officers, or managers cannot have been convicted of any felony in the last six years
✓ The vendor or any of its current owners, officers, or managers cannot have been formerly employed by any vendor that was disqualified from a USDA food program in the last six years
*LDH defines a full-line grocery store as one that stocks at all times: five varieties of cereal with five or more units of each variety; three varieties of bread or tortillas with five or more units of each variety; four varieties of fresh fruits with at least five units of each variety; four varieties of fresh vegetables with at least five units of each variety; four varieties of fresh or frozen meat, poultry, or fish with at least five units of each variety; and two varieties of rice with six or more units of each variety. **Source:** LDH WIC vendor guide

By including information on the Participant Access Determination process, LDH could potentially increase the number of vendor applications it receives, then make determinations on whether these prospective vendors could benefit participants in high-need/underrepresented areas. According to LDH, it would like to attract more vendors in underrepresented areas.

LDH's policy for Participant Access Determinations may be too restrictive and prevent some vendors, including nontraditional vendors such as A50 stores, from participating in WIC or continuing their participation in the program. State agencies establish their own criteria for Participant Access Determinations. LDH defines inadequate participant access as not having another authorized vendor within three miles of the vendor being assessed. Although LDH updated its policy in August 2026 to allow considerations for geographic barriers, the current definition for inadequate participant access does not account for other variables, such as proximity to public transportation or the differences between rural and urban areas. Alabama and Kentucky have Participant Access Determination policies that account for differences between urban and rural areas and other issues that could impact access that make access

unreasonably difficult. While Alabama's mile range for participant access is larger than Louisiana's (10 miles versus three miles), Alabama's provides for increased flexibility with the ability to consider "other conditions [that] make participant access unreasonably difficult." Given Louisiana's lack of vendors, particularly in low-income areas,[16] it is important that LDH base inadequate participant access determinations on all relevant and impactful criteria. As mentioned previously, access to WIC vendors is low in Louisiana for low-income citizens, with 18% having convenient access to a WIC vendor.

A50 WIC Vendor



Source: Picture taken by legislative auditor's staff

LDH should revise its Participant Access Determination policies to attract and authorize some nontraditional vendors – such as A50 stores – without having to alter its criteria for all vendors. This would allow LDH to assess the value of authorizing these stores on a case-by-case basis without lowering standards for all vendors. For example, a recent vendor applicant in Baton Rouge had to go through the Participant Access Determination process because it wanted to operate as an A50 vendor. Representatives from the prospective vendor said it took from October 2025 to the end of February 2026 to find a location that met LDH's definition for inadequate participant access. If LDH broadened its definition to include other factors, such as public transportation access or neighborhood layouts, the process may have been quicker for this vendor applicant and could open the door for additional vendors like it.

In addition, prospective WIC vendors may face delays in initial authorization by as many as four months because of LDH's authorization schedules, which could impact vendor participation. Under LDH's previous policy, it would not authorize new vendors in the last four months of a trade area's three-year authorization period, resulting in a delay for the vendor as a WIC provider.[17] However, in August 2026 LDH revised its policy to allow it to waive that delay, though the policy does not specify when waiving the delay may be appropriate. For example, LDH may choose to waive an authorization delay if the vendor is in an underserved area so that vendor can open as soon as possible.

[16] The USDA's Economic Research Service (ERS) uses the term "low income" to indicate when a census tract with a poverty rate of at least 20% or a median family income at or below 80% of the metropolitan area or the state's median income level. ERS uses "low access" to describe tracts where a significant share of residents is more than one mile from the nearest large food store in urban areas or 10 miles in rural areas.

[17] LDH divides its vendors into three geographic trade areas for the purpose of authorization and reauthorization. LDH uses three-year agreements for vendors as often as possible, but new vendors are given agreements that last until the end of their trade area's current cycle.

Recommendation 3: LDH should include information on federally-allowed exceptions in its WIC's vendor application packet to potentially increase the number of vendor applications in areas without WIC vendors.

Summary of Management's Response: LDH agreed with this recommendation and stated that it will include a statement on the first page of its vendor application clarifying that certain eligibility criteria may be waived for vendor applicants or vendors located in areas with inadequate participant access. Additionally, LDH will update the checklist in Section I to include a direct link to the Louisiana WIC Vendor Policy Manual, which outlines the applicable exceptions and waiver provisions. Updates will be completed by December 31, 2026. See Appendix A for LDH's full response.

Recommendation 4: LDH should revise its definition for sufficient access and account for additional factors such as differences between rural and urban areas when considering applications from nontraditional vendors while still maintaining current standards for traditional vendors.

Summary of Management's Response: LDH agreed with this recommendation and stated that it has recently updated the Participant Access definition to explicitly allow for the consideration of Geographic Barriers. In addition, LDH will further research how other WIC state agencies define participant access and analyze which specific criteria would be best suited for the WIC landscape in Louisiana. Based on the findings, LDH will adjust its participant access criteria and submit the revisions to USDA by June 2027. See Appendix A for LDH's full response.

Recommendation 5: LDH should develop criteria for authorizing vendors during the last four months of an authorization period in cases where a vendor would fill a need, such as serving an underrepresented area.

Summary of Management's Response: LDH agreed with this recommendation and stated that it will revise the policy to permit the processing of vendor applications during the final four months of an authorization period. Vendor applicants located in areas with inadequate WIC participant access may be authorized to begin accepting WIC transactions during this timeframe. Revised policies will be submitted to USDA for approval by January 31, 2027. See Appendix A for LDH's full response.

While the USDA does not require state agencies to monitor all vendors at least once during a defined period of time, we found that LDH did not conduct a routine monitoring visit or compliance investigation of 223 (63.9%) of 349 vendors during federal fiscal years 2023 through 2026. Routine monitoring is important to ensure vendors are providing proper services to WIC participants.

The USDA requires state agencies to perform both routine monitoring and compliance investigations of vendors to ensure compliance with federal and state criteria. State agencies are required to perform routine monitoring visits on 5.0% of the total number of authorized vendors as of the start of the current federal fiscal year and to perform compliance investigations on an additional 5.0% of authorized vendors. Routine monitoring visits are on-site investigations where LDH staff identify themselves to the vendor's staff. Compliance investigations could include inventory audits where LDH staff audits the vendor's inventory to ensure the inventory matches what has been charged to WIC or compliance buys, which are covert visits where an agency employee poses as a WIC participant. Compliance investigations are primarily focused on vendors on LDH's high-risk vendor list, which is determined using a matrix. The matrix includes factors such as low variance in sales, transactions outside of business hours, and participant complaints, among others.

LDH's policy requires vendors to be selected for monitoring at random, as long as there is at least one vendor selected from each LDH region but does not ensure that all vendors receive monitoring at some point during a defined period of time. LDH's routine monitoring or compliance investigation policies do not ensure every vendor is periodically reviewed as part of a formal monitoring or investigative visit. Under current policy, it would be possible for a vendor to go indefinitely without being selected for a routine monitoring visit or a compliance investigation. We found that 223 (63.9%) of 349[18] vendors have not been subject to either a routine monitoring visit or compliance investigation during a four-year period [Federal Fiscal Year (FFY) 2023-2026]. We requested historical monitoring information for five of the 223 vendors[19] and found that LDH had not formally monitored one (20.0%) of the vendors, such as with a routine monitoring visit or compliance investigation, in eight years. Routine monitoring and compliance investigations are performed to detect any abuse or errors by vendors and ensure that corrective action is implemented.

[18] This only includes the vendors that were active by the start of FFY23, which was October 1, 2022, and remained active until September 30, 2026.
[19] Because LDH moved to a new tracking system in October 2022, our data did not include historical monitoring information prior to this date.

Although LDH does analyze transaction data such as transactions identified outside of business hours and low variance in transaction amounts to identify high-risk vendors for formal monitoring, some issues such as a vendor failing to update LDH on new UPC codes for WIC-eligible items[20] or failing to meet minimum stock requirements would not be detected through transaction data metrics. As a result, any such vendors that have acceptable transaction data trends may never receive formal review and correction.

> **Recommendation 6:** LDH should develop and implement a systematic approach for scheduling routine monitoring visits to ensure all vendors receive a routine visit periodically.
>
> **Summary of Management's Response:** LDH agreed with this recommendation and stated that it will update this policy to reflect a more systemic approach to vendor monitoring. In lieu of random monitoring visits, LDH will implement a rotating monitoring schedule to promote consistent and evenly distributed coverage and maximize the number of vendors reviewed. Revised policies will be submitted to USDA for approval by January 31, 2027. See Appendix A for LDH's full response.

LDH could improve WIC shopping experience and participation by better addressing trends in vendor complaint data, as 72.6% of vendor complaints indicated transaction issues such as a participant not being able to complete a WIC purchase at the register. Addressing these concerns may also increase redemption rates.

LDH has an online complaint form for WIC participants to submit complaints about individual vendors. LDH received 368 shopping-related complaints during calendar years 2021 through 2025. Most complaints were related to trouble purchasing items (72.6%), such as produce, or formula recalls or returns (16.8%) rather than directly associated with the vendor.[21] Exhibit 4 categorizes the complaints LDH received on WIC vendors during calendar years 2021 through 2025.

[20] UPCs for packaged fruits are constantly changing due to changing suppliers/packagers. LDH relies on vendors to report any new UPCs for these WIC-eligible items so it can update its system. Otherwise, a WIC participant's WIC EBT card will not allow the purchase.

[21] We excluded 14 submissions as they were either positive experiences (not a complaint), duplicates, or related to a WIC shopping experience in another state.

Exhibit 4 WIC Vendor Complaints* Calendar Years 2021 through 2025		
Complaint Type	**Number of Complaints**	**Percentage of Complaints****
Transaction Issues	267	72.6%
Formula Recall/Returns	62	16.8%
Store Conditions/Customer Service	43	11.7%
Product Unavailable	14	3.8%
Unclear	8	2.2%
Total Complaints	**368*** **	

*Based on complaints received bv LDH rather than counts of confirmed vendor noncompliance. For example, some complaints related to transaction issues could be the result of participants attempting to purchase items that are not WIC approved. However, complainants did not always provide enough information to make this determination.
**The sum of percentages exceeds 100% because a single complaint can include multiple issues.
***The total number of categorized complaints exceeds the total number of complaints because a single comment can include multiple issues.
Source: Prepared by legislative auditor's staff using data provided by LDH.

Of the 204[22] complaints related to transaction issues that specified food types, the most common food items involved were fruits and vegetables (69 or 33.8%). According to vendors, fresh produce is often erroneously flagged as ineligible both in the MyWIC app[23] and at the register because of changing Universal Product Codes (UPCs) for produce. In addition to specified food items, WIC participants receive cash value benefits (CVBs), which are monthly allowances loaded onto EBT cards to purchase fresh, frozen, or canned fruits and vegetables. According to LDH, CVBs offer greater flexibility in selecting brands and quantities compared to other WIC food purchases and is popular among participants. For example, for the dairy category, participants are limited to certain products, brands, quantities, and sizes. However, for fruits and vegetables, participants are generally[24] allowed to select any type, brand, and size fruits or vegetables of their preference, if the cost does not exceed their CVB allowance.

Although the CVB flexibility should theoretically be associated with fewer transaction issues, LDH, vendors, and participants have mentioned that eligible produce may erroneously register as ineligible in the MyWIC app or at the register. According to vendors, this is because produce suppliers and packagers are constantly changing, meaning produce shipments to stores can have a different UPC than the previous shipment of the same product. Of the 204 transaction-

[22] There were 267 complaints related to transaction issues. However, 204 of these complaints specified the food items involved.
[23] Participants are encouraged by LDH to download the MyWIC application to their smartphones. According to LDH, participants can scan items through their WIC app to check eligibility before they check out at the store.
[24] No items that combine produce with other ingredients are allowed (e.g., pre-packed salad kits, trail mix, etc.).

related complaints which listed food items, 69 (33.8%) involved fruits and vegetables. This issue may contribute to the 37.5% of CVBs that were not redeemed during calendar year 2025.[25]

Vendors are responsible for updating their UPCs with LDH, but the volume of UPC changes makes it difficult for the vendors, resulting in the need to fix the problem at the checkout stand. According to LDH, when a fruit, vegetable, or herb registers as ineligible during checkout, the vendor should report the UPC number to LDH so it can be added to the system. However, this process does not allow for immediate corrections and results in participants paying out-of-pocket for WIC-eligible items or leaving without the items as was demonstrated during a covert compliance buy *(see text box at right)*. According to one vendor, to ensure participants can redeem their CVBs, the vendor has developed a workaround for cashiers and trained them to use a special UPC during this instance and the vendor reports the new, unrecorded UPC to LDH. However, LDH staff expressed concerns that this work around could result in issues with pricing. LDH staff said this is an issue in other states as well and has worked with vendors to provide education on updating and mapping the new UPCs, but the problem largely stems from distribution systems beyond both LDH's and vendors' control. In addition, LDH's process does not immediately update its system with newly reported UPCs. According to one stakeholder, they notified LDH of a new UPC for onions and after six weeks had still not resolved the issue. According to LDH, new UPCs have to be reviewed to ensure the products meet USDA requirements.

Notes from an LDH WIC Compliance Buy monitoring visit:

"I attempted to purchase pint of blueberries. The cashier wasn't sure why the blueberries were not WIC-approved. She speculated it could be because they were organic. She removed the items and proceeded with the transaction."

According to LDH, all varieties of fresh blueberries, including organic, are considered WIC-approved.

The availability of certain products, such as specialty formulas,[26] appears to cause confusion for some participants. While only seven (1.9%) of the 368 complaints sent to LDH referenced issues with finding specialty formulas in stores, the lack of availability of this formula could have serious consequences for infants.[27] This lack of availability was discussed during a Louisiana Senate Select Committee on Women and Children meeting on August 17, 2026. One Louisiana resident during the meeting, along with several who filed complaints, said they have had problems finding specialty formula when shopping at an authorized WIC vendor. According to LDH, neither vendors nor clinics are required to keep specialty formula in stock. However, clinics must order specialty formula for participants when needed. LDH should communicate this policy more clearly to participants when they receive approval for specialty formulas.

[25] According to LDH, while all unique, eligible benefits are loaded onto each WIC participant's card, participants do not always redeem every item during their WIC purchases. As a result, federal funding allocated for WIC foods is not completely used.
[26] Specialty formulas are those issued for specific dietary needs.
[27] For example, infants may have severe allergies to other formulas.

Recommendation 7: LDH should develop a more timely process for updating produce UPCs within its transaction system and ensure vendors are properly trained in handling instances when a WIC participant is unable to pay for a WIC-eligible item with their WIC card.

Summary of Management's Response: LDH agreed with this recommendation and stated that in July 2026 it adopted a standard operating procedure (SOP) for receipt, review, and response of UPC submissions with the goal of standardizing and streamlining the process. By January 31, 2027, LDH will further refine the SOP to establish clear turnaround time expectations for each stage of the review process. See Appendix A for LDH's full response.

Recommendation 8: LDH should ensure WIC clinics clearly and proactively educate WIC participants on the options for obtaining specialty formula.

Summary of Management's Response: LDH agreed with this recommendation and stated that to promote consistent implementation and ensure program compliance, it will incorporate guidance on the specialty formula process in its annual WIC clinic staff training to ensure staff are educating participants. In addition, LDH will include information regarding specialty formula in the WIC Vendor Guide, ensuring vendors understand the process and can help communicate it to shoppers in their store. The updated vendor guide will be finalized by December 31, 2026. See Appendix A for LDH's full response.

APPENDIX A: MANAGEMENT'S RESPONSE

Jeff Landry
GOVERNOR

Bruce D. Greenstein
SECRETARY

State of Louisiana

Louisiana Department of Health
Office of Health and Nutrition

VIA E-MAIL ONLY

November 13, 2026

Mr. Michael J. "Mike" Waguespack
Louisiana Legislative Auditor
P. O. Box 94397
Baton Rouge, Louisiana 70804-9397

Re: **Vendor Regulation - Supplemental Nutrition Program for Women, Infants, and Children (WIC)**

Dear Mr. Waguespack:

The Louisiana Department of Health (LDH) acknowledges receipt of correspondence from the Louisiana Legislative Auditor (LLA) dated October 23, 2026, titled **Vendor Regulation – Special Supplemental Nutrition Program for Women, Infants, and Children**. LDH appreciates the opportunity to provide this response to your office's findings.

Conclusion 1: Following the USDA moratorium from 2014 through 2017 on Louisiana's ability to add new WIC vendors, the state lost 57.1% of its authorized vendors. After the moratorium was lifted in 2017, LDH had only increased the number of WIC vendors by 24.5% during state fiscal year 2026. Fewer than half of Louisiana neighborhoods and only 18% of low-income neighborhoods are considered to have convenient access to an authorized WIC vendor.

Recommendation 1: LDH should work with potential vendors to increase vendor access in low-income areas while still complying with USDA criteria.

LDH Response: LDH concurs with the recommendation.

Corrective Action: LDH will develop and implement a statewide WIC vendor recruitment strategy by January 2027 designed to expand retailer participation, strengthen vendor retention, and improve access to WIC-authorized retailers across Louisiana. The strategy will incorporate a statewide geographic mapping analysis identifying existing retail grocers not currently authorized WIC vendors,

alongside current WIC-authorized retailers, to identify service gaps and prioritize recruitment opportunities.

LDH will conduct targeted outreach to former WIC vendors to assess their interest in rejoining the program, identify barriers to continued participation, and determine opportunities to address challenges related to vendor retention. In parallel, LDH will evaluate existing policies and procedures that may create barriers to new vendor authorization or ongoing participation and identify opportunities for process improvements and policy modifications to support vendor recruitment and retention. For example, vendors are required to maintain minimum stock requirement (MSR) levels that often exceed WIC redemption leading to overstock and spoilage. Therefore, adjusting the minimum stock requirements policy allows for venders to maintain a level of stock more consistent with participant shopping patterns. Another modification involves the quarterly competitive price analysis on all vendors which is designed to ensure authorized vendors maintain pricing that is competitive with the broader retail market, thereby safeguarding program funds and supporting participant access to affordable foods. However, a reduction in the frequency of CPC analysis will alleviate the burden while still maintaining appropriate oversight of pricing competitiveness.

Recruitment efforts will prioritize SNAP-authorized retailers that do not currently participate in WIC, leveraging this existing retailer network to identify prospective vendors and streamline outreach. Additionally, LDH will launch a community engagement initiative encouraging residents and WIC participants to identify grocery retailers in their communities that may be suitable candidates for WIC authorization. LDH will follow up directly with identified retailers to communicate program requirements, assess interest, and facilitate the vendor application and authorization process.

Recommendation 2: LDH should work with the USDA to increase vendor access for households immediately after a child is born. This could include adopting policies on online ordering/grocery delivery if and when allowed by the USDA.

LDH Response: LDH concurs with the recommendation.

Corrective Action: The Louisiana Department of Health (LDH) is advancing efforts to modernize the WIC shopping experience by preparing for online shopping as a strategic pathway to expand participant access, enhance vendor participation, and increase flexibility in how WIC benefits are redeemed.

To support this initiative, LDH plans to apply for grant funding through the Center for Nutrition & Health Impact (CNHI) under its new WIC Online Shopping

Implementation Support Initiative. The grant would support foundational implementation activities, including required system enhancements and initial vendor identification. LDH intends to submit its application in early 2027.

WIC online shopping implementation is structured around four key phases: (1) Plan and Prepare, (2) Design and Build, (3) Implement, and (4) Maintain. Through this initiative, CNHI will provide grantees and their partners with project management support and technical assistance to guide implementation, address operational and technical requirements, and establish scalable, compliant online shopping solutions that can be sustained over time.

Conclusion 2: LDH's vendor application and checklist direct applicants to the vendor requirements, but the materials do not clearly state exceptions to the state's criteria in underserved areas. As a result, non-traditional vendors in those areas may not apply for authorization because they do not meet all requirements, even if they could qualify for an exception.

Recommendation 3: LDH should include information on federally allowed exceptions in its WIC's vendor application packet to potentially increase the number of vendor applications in areas without WIC vendors.

LDH Response: LDH concurs with the recommendation.

Corrective Action: On the first page of the vendor application, LDH will include a statement clarifying that certain eligibility criteria may be waived for vendor applicants or vendors located in areas with inadequate participant access. Additionally, LDH will update the checklist in Section I to include a direct link to the Louisiana WIC Vendor Policy Manual, which outlines the applicable exceptions and waiver provisions. Updates will be completed by December 31, 2026.

Recommendation 4: LDH should revise its definition for sufficient access and account for additional factors such as differences between rural and urban areas when considering applications from nontraditional vendors while still maintaining current standards for traditional vendors.

LDH Response: LDH concurs with the recommendation.

Corrective Action: LDH agrees with the approach of utilizing flexibilities in the definition of participant access in order to increase potential opportunities to authorize new vendors. LDH has recently updated the Participant Access definition to explicitly allow for the consideration of Geographic Barriers. LDH will further research how other WIC state agencies define participant access and

analyze which specific criteria would be best suited for the WIC landscape in Louisiana. Based on the findings, LDH will adjust its participant access criteria to better account for differences in access across Louisiana. Any policy related revisions will be submitted to USDA for approval by June 2027.

Recommendation 5: LDH should develop criteria for authorizing vendors during the last four months of an authorization period in cases where a vendor would fill a need, such as serving an underrepresented area.

LDH Response: LDH concurs with the recommendation.

Corrective Action: LDH will revise the policy to permit the processing of vendor applications during the final four months of an authorization period. Vendor applicants located in areas with inadequate WIC participant access may be authorized to begin accepting WIC transactions during this timeframe. Revised policies will be submitted to USDA for approval by January 31, 2027.

Conclusion 3: While the USDA does not require state agencies to monitor all vendors at least once during a defined period of time, we found that LDH did not conduct a routine monitoring visit or compliance investigation of 223 (63.9%) of 349 vendors during federal fiscal years 2023 through 2026. Routine monitoring is important to ensure vendors are providing proper services to WIC participants.

Recommendation 6: LDH should develop and implement a systematic approach for scheduling routine monitoring visits to ensure all vendors receive a routine visit periodically

LDH Response: LDH concurs with the recommendation.

Corrective Action: LDH will update this policy to reflect a more systemic approach to vendor monitoring. In lieu of random monitoring visits, LDH will implement a rotating monitoring schedule to promote consistent and evenly distributed coverage and maximize the number of vendors reviewed. Revised policies will be submitted to USDA for approval by January 31, 2027.

Conclusion 4: LDH could improve WIC shopping experience and participation by better addressing trends in vendor complaint data as 72.6% of vendor complaints indicated transaction issues such as a participant not being able to complete a WIC purchase at the register. Addressing these concerns may also increase redemption and participation rates.

Recommendation 7: LDH should develop a more timely process for updating produce UPCs within its transaction system and ensure vendors are properly

trained in handling instances when a WIC participant is unable to pay for a WIC-eligible item with their WIC card.

LDH Response: LDH concurs with the recommendation.

Corrective Action: In July 2026, LDH adopted a standard operating procedure (SOP) for receipt, review and response of UPC submissions with the goal of standardizing and streamlining the process. By January 31, 2027, LDH will further refine the SOP to establish clear turnaround time expectations for each stage of the review process. Additionally, LDH will implement an expedited review pathway for fresh produce submissions that bypasses the nutritionist review step, where appropriate, to reduce processing time and accelerate product approvals. When conducting in-store visits, LDH staff will proactively collect fresh produce UPCs for consideration for addition to the WIC Approved Product List (APL). Recognizing that UPC mapping challenges affect WIC programs nationwide, LDH engaged regional consortium partners in a discussion of these challenges during the October 14, 2026, regional meeting in Dallas to identify opportunities for process improvement and share potential solutions.

LDH will work with its' Management Information Systems (MIS) contractor and consortium partner agencies on system enhancements that will make it easier for participants, vendors, and/or distributers to submit UPCs for review and for partner agencies to receive, review, and approve UPCs submissions, and to share approve UPCs across agencies.

LDH WIC is also strengthening participant and vendor education to improve understanding of program benefits, policies, and transaction procedures. As part of this effort, WIC is investing in the development of standardized, high-quality educational videos designed to address common operational challenges and promote more efficient benefit redemption. Vendor-focused content will include cashier training on common point-of-sale issues and guidance for participants on steps they can take at checkout to facilitate successful transactions. Materials will be produced in English and Spanish, distributed via DVD for clinic-based use, and made available in web-based formats to expand access for vendors and other stakeholders.

Recommendation 8: LDH should ensure WIC clinics clearly and proactively educate WIC participants on the options for obtaining specialty formula.

LDH Response: LDH concurs with the recommendation.

Corrective Action: WIC has an established policy governing the request and issuance of specialty formulas, supported by a collaborative process between

WIC clinics and pediatric healthcare providers. When an infant is unable to tolerate standard formula, the WIC clinic refers the family to the pediatrician, who evaluates the infant's needs and recommends the appropriate exempt formula. To promote consistent implementation and ensure program compliance, LDH will incorporate guidance on the process in its annual WIC clinic staff training to ensure staff are educating participants about their available formula options, explaining the process for requesting specialty formula, and helping families understand the steps needed to obtain the formula most appropriate for their infant. LDH will also include information regarding specialty formula in the WIC Vendor Guide, ensuring vendors understand the process and can help communicate it to shoppers in their store. The updated vendor guide will be finalized by December 31, 2026.

You may contact Timothy Messa, WIC Vendor Operations Manager, at (225)342-7897 or via e-mail at timothy.messa@la.gov with any questions about this matter.

Sincerely,

Bruce D. Greenstein
Secretary

APPENDIX B: SCOPE AND METHODOLOGY

This report provides the results of our performance audit of the Louisiana Department of Health's (LDH) - Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). We conducted this performance audit under the provisions of Title 24 of the Louisiana Revised Statutes of 1950, as amended. This audit generally covered July 1, 2021, through June 30, 2026. Our audit objective was:

To evaluate LDH's regulation of WIC vendors to promote successful redemption of food benefits by participants.

We conducted this performance audit in accordance with generally-accepted *Government Auditing Standards* issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We obtained an understanding of internal control that is significant to the audit objective and assessed the design and implementation of such internal control to the extent necessary to address our audit objective. We also obtained an understanding of legal provisions that are significant within the context of the audit objective, and we assessed the risk that illegal acts, including fraud, and violations of applicable contract, grant agreement, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

To answer our objective, we performed the following audit steps:

- Reviewed applicable state and federal laws and regulations.
- Reviewed state WIC policies and compared to other states.
- Obtained and analyzed vendor management reports detailing vendor status, locations, and transactions for state fiscal years 2023 through 2026.
- Obtained feedback from active WIC vendors and a prospective A50 WIC vendor.
- Reviewed United States Department of Agriculture research on WIC participant access to vendors nationwide.

- Obtained and analyzed active vendor counts for state fiscal years 2019 through 2026.

- Used logistical regression to estimate the relationship between WIC benefits usage, distance to nearest vendor, whether a birth occurred in the household in that month, and the number of beneficiaries in the household. We used the following model:

$$ln\left(\frac{P(\text{used}_{\text{benefits}_i}=1)}{1-P(\text{used_benefits}_i=1)}\right)=\beta_0+\beta_1\text{birth}_i+\beta_2\text{distance_miles}_i+\sum_{k=2}^{7}\beta_{3,k}\,\text{beneficiaries}_{k,i}+\sum_{m=2}^{12}\beta_{4,m}\,\text{months}_{m,i}$$

- Our detailed results are as follows:

Predictor	Marginal Effect*	95% Confidence Interval	*p*-value	Interpretation
Birth in Current Month	-0.0600	[-0.0661, -0.0539]	<0.001	6.0 percentage points less likely to use benefits
Distance (Miles)	0.0015	[0.0012, 0.0018]	<0.001	0.15 percentage points more likely per mile
Number of Beneficiaries (Baseline: 1)				
2	0.0715	[0.0696, 0.0734]	<0.001	7.15 percentage points more likely
3	0.0809	[0.0778, 0.0840]	<0.001	8.09 percentage points more likely
4	0.0739	[0.0665, 0.0813]	<0.001	7.39 percentage points more likely
5	0.0862	[0.0659, 0.1065]	<0.001	8.62 percentage points more likely
6	0.0105	[-0.0607, 0.0818]	0.772	Not statistically significant
7	-0.3401	[-0.7289, 0.0488]	0.087	Not statistically significant
Month (Baseline: January)				
February	0.0009	[-0.0040, 0.0058]	0.723	Not statistically significant
March	0.0146	[0.0097, 0.0194]	<0.001	1.46 percentage points more likely
April	0.0239	[0.0191, 0.0288]	<0.001	2.39 percentage points more likely
May	0.0382	[0.0334, 0.0429]	<0.001	3.82 percentage points more likely
June	0.0500	[0.0453, 0.0547]	<0.001	5.00 percentage points more likely
July	0.0702	[0.0656, 0.0748]	<0.001	7.02 percentage points more likely
August	0.0850	[0.0805, 0.0896]	<0.001	8.50 percentage points more likely
September	0.0997	[0.0952, 0.1041]	<0.001	9.97 percentage points more likely
October	0.1146	[0.1102, 0.1190]	<0.001	11.46 percentage points more likely
November	0.1213	[0.1169, 0.1257]	<0.001	12.13 percentage points more likely

Predictor	Marginal Effect*	95% Confidence Interval	*p*-value	Interpretation
December	0.1387	[0.1344, 0.1430]	<0.001	13.87 percentage points more likely
*Marginal effects reported are Average Marginal Effects as calculated by Stata's *margins, dydx(*)* post-estimation command.				

- Obtained and analyzed Louisiana WIC's monitoring and compliance investigation data for state fiscal years 2023 through 2026 as LDH moved to a new tracking system in state fiscal year 2023.
    - Reviewed a targeted selection of vendor monitoring files to include a variety of the monitoring types for each year.
        - Monitoring types include routing monitoring visits, compliance buy investigations, and inventory audits.
        - Specifically, we reviewed files for 33 (12.0%) of LDH's 274 formal vendor monitoring activities during federal fiscal years 2023 through 2026, by year.
    - Identified the year of the last monitoring visit or compliance investigation for a randomized selection of five (2.2%) of 223 vendors that did not receive formal monitoring during state fiscal years 2023 through 2026.
        - Randomization was done using the random number generator function in Excel.
- Obtained and analyzed Louisiana WIC shopping experience complaints received by LDH during calendar years 2021 through 2025.
- Provided LDH with our results and incorporated its feedback throughout the report.

APPENDIX C: LDH's WIC ELIGIBILITY CRITERIA FOR PARTICIPANT ACCESS DETERMINATION

The following exhibit provides additional information on LDH's eligibility criteria for authorizing WIC vendors. The exhibit also shows whether the criteria would be eligible to be waived if a vendor applicant would provide sufficient vendor access in an area.

LDH WIC Criteria for Authorized Vendors and Eligibility for Participant Access Determinations	
Louisiana WIC Vendor Requirement	**Eligible for Participant Access Determination?**
Completed WIC vendor application	No
Authorized and participating as a SNAP vendor	Yes
Have a grocery class permit to operate issued under the Bureau of Sanitarian Services for the current state fiscal year	No
Maintain establishment in a clean, orderly, and safe condition	Yes
Be open a minimum of 6 days and at least 48 hours per week	Yes
Have prices that are competitive with other vendors in the vendor's designated peer group	Yes
Display prices for WIC-approved food items on the foods or on the shelves or display area	Yes
Stock and maintain sufficient quantities and varieties of all WIC-approved food items	No
Purchase infant formula only from suppliers included on LDH's list of infant formula manufacturers	No
Denial or termination of vendor application or agreement	No
The vendor or any of its current owners, officers, or managers cannot have been formerly employed by any vendor that was disqualified from a USDA food program in the last six years	Yes
The vendor or any of its current owners, officers, or managers cannot have been convicted of any felony in the last six years	Yes
The vendor or any of its current owners, officers, or managers cannot have been convicted of any federal, state, or local tax violations in the past six years	Yes
The vendor or any of its current owners, officers, or managers cannot have a civil judgement entered against them in the last six years for any activity indicating a lack of business integrity	Yes
Must be in good standing with no unpaid or overdue balances owed to LDH	Yes
Provide truthful and accurate information to LDH and not have had a vendor agreement terminated due to false or inaccurate information within the last six years	No
Have access to a computer with internet and have an email account that can be used to send and receive messages to and from LDH, and must be able to download and upload electronic documents sent via email or via the vendor portal	No
Must utilize a cash register system that performs split tender transactions and produces itemized receipts	Yes
Must not derive or expect to derive more than 50% of annual food sales revenue from WIC transactions	Yes

LDH WIC Criteria for Authorized Vendors and Eligibility for Participant Access Determinations	
Louisiana WIC Vendor Requirement	**Eligible for Participant Access Determination?**
Agree to be placed in a vendor peer group with other A50 vendors when deriving more than 50% of annual food sales from WIC transactions, and must maintain prices at levels that do not exceed the average payouts to regular vendors	No
An A50 vendor must agree to neither provide or advertise or indicate an intent to provide customers with any incentive items	No
Must be a full-line grocery store*	Yes
*LDH defines a full-line grocery store as one that stocks at all times: five varieties of cereal with five or more units of each variety; three varieties of bread or tortillas with five or more units of each variety; four varieties of fresh fruits with at least five units of each variety; four varieties of fresh vegetables with at least five units of each variety; four varieties of fresh or frozen meat, poultry, or fish with at least five units of each variety; and two varieties of rice with six or more units of each variety. **Source:** LDH WIC vendor guide	